18 November 2019

Director – Industry Assessments,
Planning and Assessment, Department of Planning, Industry and Environment,
Locked Bag 5022
PARRAMATTA NSW 2124.

RE: Objection to Minto Resource Recovery Facility Proposal (SSD-5339)

Origin Energy Retail (NSW) LPG Pty Limited current lessee of 22-26 Pembury Street, Minto, being a subsidiary of Origin Energy Limited (a publicly listed corporation) ('Origin') hereby tender our objections in respect of the Minto Resource Recovery Facility Proposal (SSD-5339) annexed to this letter as "Enclosure A".

In summary, whilst Origin is generally supportive of sustainable local business operations, we hold serious concerns about this proposal for the following reasons (please refer to "Enclosure A" for full details):-

- The various assessments submitted as part of the application for expansion have failed to appropriately demonstrate how impacts arising from the proposal will be managed.
- The applicant has made no attempt to consult with Origin prior to lodging this proposal
- Air quality is currently a concern. There is no appropriate provision for the management of dust and fine particulates (particularly from concrete crushing and screening activities) which present a risk to workers in the area.
- Dust on the road from the operation and the trucks entering the site will increase the amount of sediment flowing into Bow Bowing Creek.
- The proposal will put a strain on traffic and infrastructure on all road surrounding the proposal site and will increase safety risk of other road users.

Origin staff have witnessed firsthand the significant environmental impacts (noise, air quality and water pollution) and traffic issues caused by the former Bingo Resource Recovery Centre located at 13 Pembury Street, Minto. The Bingo Resource Recovery Centre, which preformed similar recycling operations as outlined in the proposal (which only processed 30,000 tonnes of material per annum at its peak), was closed by the EPA in 2019 as a result of deficiencies in its' operations leading to breaches of environmental regulations. Origins main concern is that the proposal (450,000 tonnes of material per annum) shows similar deficiencies that will lead to significant environmental impacts on both the Origin site and the surrounding area.

Yours sincerely,
Adam Franks

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This is “Enclosure A”

Contents

1.1 About Origin and the Origin LPG Terminal at Minto

Origin Energy (ASX: ORG) is the leading Australian integrated energy company with market leading positions in energy retailing (approximately 4.2 million customer accounts), power generation (approximately 6,000 MW of capacity owned and contracted) and natural gas production (1,093 PJ of 2P reserves and annual production of 82 PJe). Through Australia Pacific LNG, its incorporated joint venture with ConocoPhillips and Sinopec, Origin is developing Australia's biggest CSG to LNG project based on the country's largest 2P CSG reserves base.

Origin's NSW state office for LPG operates from the Minto terminal and services the wider Sydney area. Up to 58 staff, with an average 40 employees access the office each weekday which equals an average of 80 vehicle movements per day. 28 Origin cylinder delivery trucks are in and out per day equalling additional 56 vehicle movements. LPG tankers access the terminal twice a day and 10 delivery trucks/couriers. In total, 160 vehicle movements in and out of the terminal are made each working day. The terminal's hours of operation are from 5am to 10.30pm

1.2 The proximity of the Proposal to Origin's LPG Terminal at Minto

Origin's LPG terminal is located at 22-26 Pembury Road, Minto. A section of the Origin terminal (outlined in blue) adjoins the Proposal site (outlined in red) as shown in the arial map below.

2.1 Air Quality Impact

Given the nature and scale of the operation, the potential for wind-blown dust is a key concern for Origin's staff who spend a lot of time outdoors in their day to day work. The EIS appears to have proposed a number of measures for managing dust such as the 6m high walls around the perimeter of the site, restriction on stockpile heights and mention of a water cart and sprinklers. However, it is unclear where and how each of these measures will specifically be implemented to provide an effective control for dust. Some of the following measures proposed do not appear to be consistent with best practice for dust management and are unlikely to be effective:

- Wall and stockpile height – the maximum height of the wall around the site is only 6m, yet the Applicant is proposing to have stockpiles which are 6m in height at the boundary of the site with other stockpiles in the centre of the site reaching 8m in height. This leaves zero margin of error for managing stockpile height and also for implementation of mitigation controls. If the stockpile at the boundary is 6m high and the wall is only 6 m high - in the event that the Applicant finds itself in need to water the stockpiles on a windy day – this is likely to mean that spray drift from sprinklers or water cart is a likely scenario for neighbour properties.
- It is best practice for stockpiles to have wind barriers on at least 3 sides – yet the only barrier proposed is the boundary wall.
- It's unclear what part of the site and process will have sprinklers installed versus being reliant on a single water cart.
- While most of the conveyors are enclosed within the crushing plant – there are a number areas where the conveyors extend beyond the enclosed space and out into the open to the stockpile area.
- The baghouse is a key control for dust and fine particulates for crushing and screening activities in the crushing plant – but no information is provided about the proposed baghouse or expected performance specifications for this control equipment.
- The crushed material has a high potential to contain dust fines. It's unclear whether the sections of the conveyors extending out into the open will be covered and whether there will be any operational measures or equipment installed to minimise the drop height.
- One of the products described is road base (sand and crushed aggregate mixed together) - it's unclear how this "mixing" is going to be achieved and whether it will be undertaken within the enclosed plant or more manually out in the open.
- The sand washing plant which includes a generator and screens was not included as an air emission source. This plant is near Origin terminal boundary and should be considered assessable under the Proposal.
- Dust from the vehicles transporting construction and demolition waste to the site is also a significant concern which is discussed in further sections below.

Air Quality Impact Assessment Report dated February 2020 from Wilkinson Murry

The Proposal will have a significant adverse air quality impact on the Origin site. This impact was demonstrated during the operation of Bingo recycling plant located at 13 Pembury Road, Minto which the EPA closed down in 2019. The Bingo recycling facility only processed up to 30,000 tonnes of material per annum. Furthermore, the air quality impact assessment report issued as part of the

proposal is deficient and cannot be relied upon as an accurate assessment of the potential air quality impact of the proposal.

Section 4.2 (Local Ambient Air Quality) of the abovementioned report issued by the proposal applicant states:-

"*No site-specific data are available to determine the existing concentrations of dust and particulate matter at sensitive receptors near the Proposal. The NSW Office of Environment and Heritage (OEH) operates a network of air quality monitoring stations across NSW. The nearest OEH monitoring station is located at Campbelltown West. The Campbelltown West monitoring station is located approximately 2.2 kilometres south of the Proposal site*."

and

"*There are no readily available site specific Total Suspended Particulates (TSP) and deposited dust monitoring data. The Campbelltown West monitoring site does not measure these components; however, estimates of the background levels for the area are required to assess the impacts of the Proposal on TSP and deposited dust*."

Section 7 (Assessment of Impacts) of the report states:-

"*This section presents the predicted impacts on air quality arising from pollutants generated by activities related to the Project for each relevant metric. Table 7-1 presents the dispersion modelling results at each of the discrete receptors shown in Figure 2-1. The incremental impacts refer to the potential impacts from activities only associated with the operation of the Project (i.e. those activities associated with the emissions detailed in Table 6-1).*

The total impacts refer to the cumulative impacts of the Project and the estimated background levels as described in Section 4."

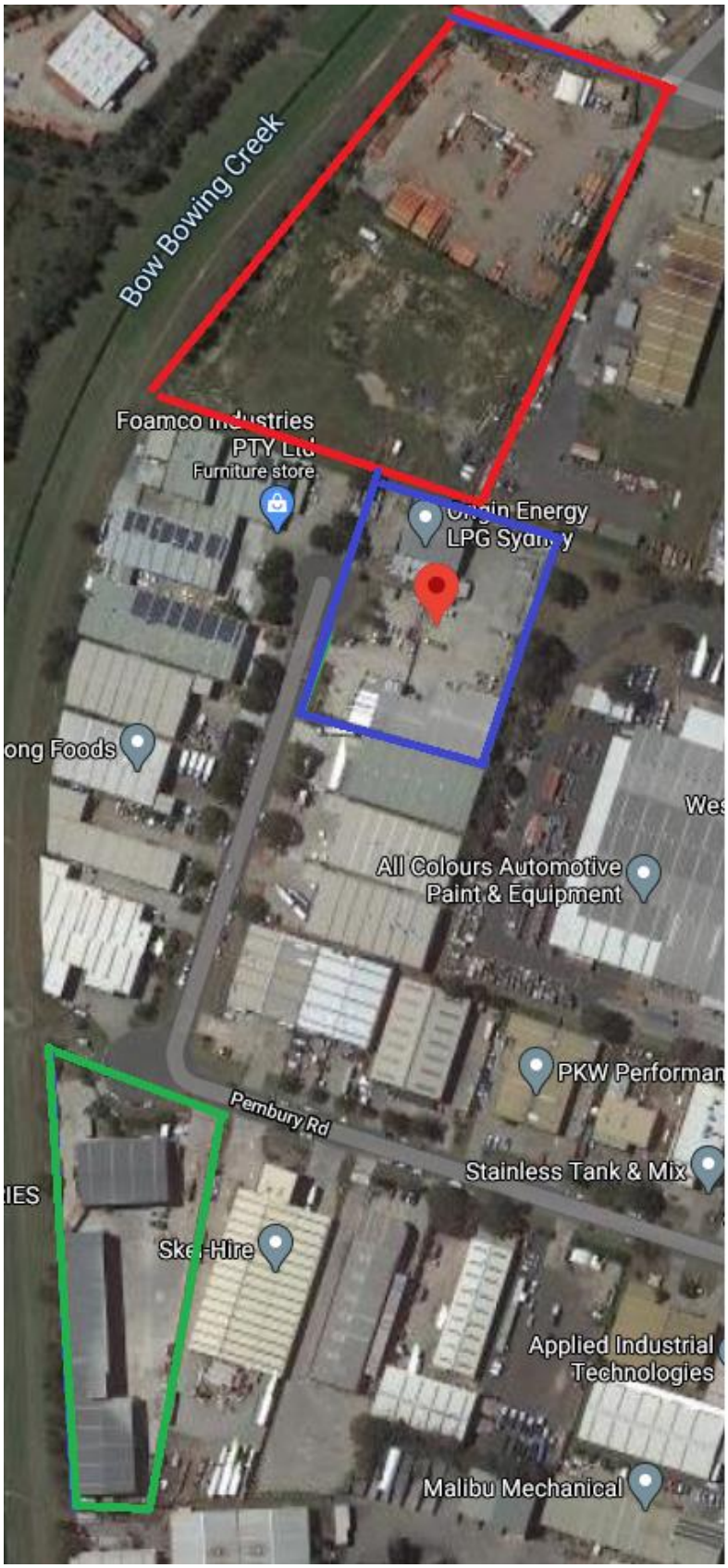
Comments

The report concedes that here are no monitoring devices near the Proposal site and that the OEH monitoring station is located at Campbelltown West is 2.2km away from the site. It is submitted that the lack of site specific data renders the report assessment of existing air quality incomplete namely because the report omit to undertake any site specific readings.

2.2 Bingo recycling plant located at 13 Pembury Road, Minto

The Bingo recycling plant at 13 Pembury Road, Minto only reached a maximum processing throughput of 30,000 tonnes per annum before the plant was closed by the EPA due to breaches to environmental regulations(even though the plant was approved for 220,000 tonnes per annum) . During the Bingo facility's operations air quality was negatively impacted together with any environmental issues in the area. The Proposal for a recycling operation of 450,000 tonnes per annum capacity, being 15 times the capacity of the Bingo facility, could significantly impact air quality in the area based on Origin's experiences with the Bingo facility. It is submitted that any assessment of the Proposal **must be** considered in conjunction with the environmental issues caused by the Bingo recycling plant during it's operation.

Below is an aerial view of the Proposal site (outlined in red), Origin LPG terminal (outlined in blue) and the Bingo recycling plant (outlined in green)



Despite having an overhead and doorways mist system (designed to suppress the dust by encapsulating the particles and dropping them from the air) and sprinklers across the yard, significant amounts of dust escaped the Bingo facility. The Bingo facility had similar dust mitigation devices as the current Proposal, but they did not prevent the air quality impacts noted below.

Below are photos of the dust on the cars parked at the Origin Terminal hundreds of metres down the road from the Bingo facility. Permitting another recycling facility immediately adjacent to Origin's site will obviously increase the amount of dust from the operation and exacerbate the dust in the area.

Dust settled on a car at the Origin terminal several hundred metres down the road

The Proposal does not address likelihood of these same issues arising from the operation of the Proposal site.

2.3 Fine particulates and crystalline silica – health impacts

The potential health impacts from exposure to crystalline silica is a key concern for Origin's staff and the Applicant needs to provide more information or a more thorough assessment to demonstrate that the impacts of PM10, PM2.5 and respirable silica do not pose an unacceptable risk to offsite receptors.

In the air quality assessment, the Applicant has stated that the "*Dust emissions from the proposed Project have been estimated for all significant dust generating activities based on information provided by the Proponent, using emission factors sourced from both locally developed and US EPA development document.*" The report then presents PM_{10} mass emission rates as well as a range of emission estimation calculation methods. Yet is it unclear from the report as to what actual inputs have been used in the model nor any explanation of whether the estimation methods and assumptions used in the calculation are appropriate what level of conservatism (if any) exists within the emission factors, the model or the results from the model.

The key sources of fine /respirable particulates will be from crushing and screening activities, with the primary source of the crystalline silica being the crushed concrete. Therefore, one key source of fine particulate is likely to be the baghouse stack from the concrete crushing plant as well as fugitive emissions from the same plant where conveyors exit the plant – but these sources seem to have been omitted from the modelling exercise entirely.

The air quality assessment has adopted the Victorian EPA criterion for Respirable Crystalline Silica for this assessment. The Victoria EPA Criterion is in turn adopted from the California EPA Office for Environmental Health Hazard Assessment Reference Exposure Levels (REL). The Chronic Toxicity Summary for Silica (Crystalline Respirable), Feb 2005 states that this REL is for 3µg/m^3 (respirable, as defined occupationally by ACGIH). Particles of respirable size as defined by occupational hygiene methods described by ACGIH has a 50% cut off point at **4µm particle aerodynamic diameter (i.e. PM_4)**, which differs from the environmental definition of respirable, which is PM_{10}.

A few key statements of note in the Chronic Toxicity summary for Silica:

"It is generally assumed that the silicosis is induced by that fraction of the silica that reaches the alveoli. Nevertheless, no actual data exonerate the coarser particles in the 4 - 10 µm range."

"A more inclusive sampling procedure, such as that used for PM10, would overestimate the relevant exposure in any situation, and so would be inappropriate for precise risk quantification. However, PM10 would be ***useful as a screening*** *method to establish that a particular situation is unlikely to present a hazard. For example, if the silica concentration in PM10 modelled at a receptor is less than the REL (3 µg/m3), occupationally respirable silica will also be less than 3 µg/m3, so a facility would not pose a risk due to silica at that receptor. If the silica concentration in PM2.5 modelled at a receptor is less than 3 µg/m3 but PM10 is greater than 3 µg/m3,* ***further testing would be needed****."*

Given that there is going to be considerable uncertainty in the crystalline silica content of the materials brought in for processing, and in the absence of better transparency in the model inputs and an explanation of the level of conservatism within the model inputs and outputs, the results show that PM_{10} is in excess of 3µg/m^3 at all three industrial receptors – which suggests that further testing is needed.

3.1 Water Quality

Impacts of dust from the Proposal on Bow Bowing Creek

Neither the applicant's Air Quality Impact Assessment Report or Site Water Management Plan (which is limited to examining how sediment is controlled on site) has assessed the potential for accumulation of dust off –site.

In the case of the prior Bingo facility the dust suppression system was not effective in preventing dust from settling on the road, hence Bingo brought in a street sweeper (sometimes two at a time). The street sweeper was also ineffective and result in sediment in the drain directly from the road. The photo below shows sediment from the Bingo Operation coming from the street, then entering Bow Bowing Creek.

The issue is whether the Proposal will cause sediment to enter Bow Bowing Creek. This is a matter that needs to be assessed by the applicant's Proposal as this was one adverse outcome of the Bingo operation. Unless dust from the operation and vehicles transporting material to the Proposal site is addressed, then dust deposition from the site and associated transport vehicles is expected to exacerbate the sediment entering the creek from roads within the catchment.

Sediment from the road in the stormwater drain and entering Bow Bowing Creek

4.1 Management of unintended waste – asbestos

Origin is concerned about asbestos being inadvertently brought to site together with the construction and demolition waste. While the applicant has acknowledged that unwanted waste streams such as plastic, timber and scrap metal could be included in the construction and demolition waste accepted on site and made the necessary plans for storage of these waste stream for disposal off site at a later date, the EIS is silent on the potential for asbestos to be inadvertently bought to site.

Origin requests that the applicant adequately address the potential for asbestos to be bought on site (including the potential for it to enter the crushing and screening plant) and to propose some appropriate mitigation measures. At the very least, there should be an enclosed bin where any asbestos waste could be safely stored until such time that it is removed for off- site disposal.

5.1 Noise Assessment

The Noise Assessment Report dated January 2019 prepared by Wilkinson Murray and submitted by the applicant as part of the Proposal does not assess the noise impact on Origin LPG Terminal. The Noise Assessment provides a detailed study of the potential impacts on surrounding residential areas but provides little detail of impacts on industrial areas around the Proposal. Section 4.4 of the assessment states:-

"4.4 Predicted Operational Noise Levels at Industrial Receivers

As discussed above, noise from various parts of the site will be intermittent depending on operations that day. Allowing for the 6m high perimeter wall along the western boundary the following noise levels are predicted at neighbouring premises based on a typical busy 15-minute period, noting the NPfI criterion of 70dBA applies to an 11-hour assessment whereby noise levels 2-3dB lower would be expected.

- *Northern 53dBA*
- *Eastern 67dBA*
- *Southern 70dBA*
- *Western 58dBA"*

However, no details are provided as to which Industrial sites will be impacted. This is a major concern for Origin as our terminal adjoins the southern boundary of the Proposal site. Noting that the Origin site includes an office facility (which requires a noise management level of 70dBA under the NSW *EPA Interim Construction Noise Guideline (ICNG)*), a predicted impact of 70dBA on the Southern boundary, per section 4.4 of the applicant's Noise Assessment, is right on the threshold of the ICNG standard and therefore a major concern for Origin.

Furthermore, Section 4.1.3 of the ICNG states that:-

"*The proponent should assess construction noise levels for the project, and consult with occupants of commercial and industrial premises prior to lodging an application where required. During*

construction, the proponent should regularly update the occupants of the commercial and industrial premises regarding noise levels and hours of work"

It is submitted that the applicant has undertaken no such assessment of noise levels on the Origin site nor has it consulted with Origin prior to making this application as required under the ICNG.

5.2 ***Inconsistency in request for SEARS and EIS.***

In the initial request for SEARS the proposal was for a resource recovery facility capable of processing up to 250,000 tonnes per annum of construction and demolition waste. However, the current EIS is now proposing 450,000 tonnes per annum which is nearly double the throughput initially proposed. Origin questions whether the scope of the SEARS would have been more onerous had the initially application been for a throughput of 450,000 tonnes per annum

6.1 Traffic Assessment

The applicant's Traffic Impact Assessment Report dated 5 March 2020 produced by McLaren Engineering has the following key omissions:-

1. The assessment of existing traffic condition is based off a single day, 13 December 2018, see exact of section 2.3 of the report below. There is no evidence to suggest that this day is a typical weekday. The observed vehicle movement on this day appear low noting the significant number of industrial and commercial operations that utilise the roads through this area. Origin alone has around 160 vehicle movement through this area on any given weekday. The applicant should be required to undertake a longer observation period and present the results; and
2. There has been no consultation with Origin or, as it appears from the report, any of the other industrial sites that operate in the area;

2.3 Existing Traffic and Parking Environment

Traffic counts were completed at the intersections of Campbelltown Rd / Rose Payten Dr, Ben Lomond Rd / Airds Rd, Airds Rd / Montore Rd, Rose Payten Dr / Pembroke Rd / Smith Street Bypass and Ben Lomond Rd / Pembroke Rd on Thursday 13th December 2018, representing a typical weekday, with results reproduced in **Annexure D** for reference.

Existing intersection performances have been assessed using SIDRA INTERSECTION 8.0. The analysis is summarised in **Table 2** below (detailed results are shown in **Annexure E**).

Section 5.1 of the report, see below, notes that there will be 342 vehicles entering and exiting the Proposal site per day. Neither the applicant noise impact report or air quality report made an assessment of the impact of these vehicle movements on levels of noise and dust production on the Origin site or the streets that surround our site.

The total number of daily truck trips (entering and exiting the site) will therefore be 342 on any given weekday. The morning peak period occurs between 8:00-10:00am with a total of 88 truck trips. The afternoon peak period will occur between 12:00-2:00pm with a total of 63 truck trips. For the purpose of analysis and as a worst-case scenario, peak hour rates of 44 vehicle trips for the AM (18 inbound; 26 outbound) and 32 for the PM (19 inbound: 13 outbound) will be adopted.

18 November 2020

Director – Industry Assessments

Planning and Assessment

Department of Planning, Industry and Environment

Locked Bag 5022

Parramatta NSW 2124

Objection to **SSD-5339** From: Nigel Dickson on behalf of

Rus Mining Pty Ltd

5 Montore Road, Minto

NSW 2566

Application:	**SSD-5339 Minto Resource Recovery Facility**
Property:	**7 Montore Road, Minto (Lot 53 DP 618900)**
Stance.:	**Objection to the development**

This proposal has been prepared in objection to the proposed Minto Resource Recovery Facility at 7 Montore Road, Minto. This objection is due to the unacceptable impacts that the development will have upon the current operation of Rus Mining Pty Ltd business at 5 Montore Road, Minto (neighbouring the proposed site). Rus Mining Pty Ltd are an established Sydney business manufacturing and distributing mining equipment for more than 11 years (Site boarded black on plan overleaf). The safety and health of the employees of Rus Mining Pty Ltd is paramount to the company and the proposed detrimental impacts that the proposal will have are unacceptable. The proposal will have unassessed issues on the quality of the products manufactured on site by Rus Mining Pty Ltd which includes foam manufacturing plant which would be heavily impacted by the proposed development.

Dickson Rothschild
D.R. Design (NSW) Pty Limited
ABN 35 134 237 540
Nominated Architects:
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Figure 1: Site Location Plan (Proposal In yellow, Rus Mining offices in black)

In its current form, should the proposal be approved is likely that Rus Mining Pty Ltd would have to close down the business permanently or incur severe costs to relocate, costs which are estimated to run into the millions.

The key reasons for this application to be rejected are:

- Unacceptable traffic implications
- Unacceptable noise implications
- Unacceptable Air Quality & levels of dust

1. Traffic Implications

The proposal allows for 450,000 tonnes of waste which will be dropped off in 16 tonne loads by trucks and then removed in 20 tonne loads by further trucks. The site itself will comprise of loads, excavators, and other ancillary machinery. There is capacity for as many as 6 articulated trucks to be queuing at any one time. Montero Road is a cul-de-sac style road unsuited to heavy constant flows of truck traffic to and from the proposed site.

The trucks are to approach the site, get inspected and then dump the waste for inspection. Once inspected the waste will either be rejected and reloaded or broken down using a mechanical pulveriser and pushed into other piles.

The proposal states that the site can process 1,600 tonnes of waste a day. With the site open 13 hours a day the proposal states there will be 171 inbound trips and 171 out bound trips per day on a weekday and 106 on a Saturday, 13 trips an hour with up to 19 vehicles during the peak. This

essentially means the site will constantly have large articulated trucks moving on and off site creating constant traffic and noise.

All vehicular movements are proposed to enter and exit from Montore Road creating significant traffic issues for the continuation of operation of the business at 5 Montore Road. All movements will have to pass Rus Mining's facility and therefore cause a constant nuisance and disturbance.

Appendix 8 – Traffic Impact Assessment assesses the impact on the surrounding residents but not on surrounding local businesses. The proposal turns Montore road into an access road for heavy goods vehicles, completely changing the existing character of the road which is used for access to offices and manufacturing buildings.

The construction phase will require 780 truck movements. These traffic movements are not properly assessed.

The impacts on the road surface on Montore Road will deteriorate extremely quickly due to the high level of trucks carrying full loads, initially during. This potential impact has not been assessed. The proposal will completely change the character. The traffic impacts will have a severe detrimental impact upon the environment around Montore Road but also the constant noise and vibration caused by the trucks will severely impact the environment within the Rus mining facility.

2. Noise Issues

As already outlined, there is to be severe traffic of large trucks constantly moving on Montore Road. There is no modelling as to how this will affect the surrounding businesses, only the residential development far to the west of the proposed site. The current character of Montore Road is that of a quite side street, the proposal will completely change this to a constant loud buzz and vibration as articulated trucks carrying full loads pass through the site. The proposal gives no consideration

There is an acoustic report provided by Wilkinson Murray, this report only assesses residential areas to the west of the site and does not include any assessment of the impacts to businesses within the vicinity of the proposal. The assessment predicts 67dBA of noise to the east of the site, however insufficient detail on how this number was arrived at. Table 4-1 within the acoustic report lists the machinery used. The sound power level is to be around 95-117dBA, without any mitigation this noise will have significant and unacceptable impacts upon Rus Mining.

Within the proposal there is proposed to be a 6m high wall along the northern and western boundary, but not on the southern or eastern boundary, based on the modelling results, lack of mitigation and close proximity to the heavy machinery the Rus Mining facility will be the most adversely affected industrial receiver from site activities. Again, there is no consideration given towards the amenity of Rus Mining and how the noise and vibration from the proposal (both the ongoing running of the site and during the construction phase).

The acoustic report completely ignores any potential impacts the proposal will have to the east and namely the facility of Rus Mining Pty Ltd. Although the zoning is General Industry, the proposal must still comply with the relevant acoustic standards and assess the potential for loss of amenity to businesses that operate within the area surrounding the proposal.

The Acoustic report clearly identifies that the proposal will have significant noise implications to Rus Mining Pty Ltd. The Acoustic report fails to assess the implication of noise from vehicles accessing the site. The Acoustic Report fails to properly assess the impacts to Rus Mining's Site and the ongoing issues that they will face, no mitigation measured are proposed to the east of the site. The proposal has significant negative implications to the amenity and ability for Rus Mining to continue their current operation in its current form.

3. Air Quality & Dust

The proposal has numerous serious implications on air quality contamination and levels of dust to be produced. The trucks accessing the site will have loads full of material and themselves likely to be covered in dust. Vehicles are required to travel at less than 10km/h whilst on site but there are no mitigation measures for the impact this will have on Montore Road. This would indicate the applicant is unable to provide such mitigating measures, proving the site, located at the end of a cul-de-sac is inappropriate for a development of this size and intensive industrial use.

The proposal will account for 781,638 tonnes of Carbon dioxide alone this is 0.006% of the total NSW emissions, from one single proposal. The air quality surrounding the development will be of an extremely poor quality.

There is to be significant amounts of dust and pollutants caused from trucks accessing the site, trucks on site travelling on unsealed roads and dust blown from stockpiles on site and exposed areas. The Air Quality Assessment states that air quality will exceed acceptable levels at I1, I2 and I3. Receiver I2 is located on the Rus Mining Pty Ltd site, this is an unacceptable reduction in the sites amenity. As previously discussed, Rus Mining manufacturing process would be severely affected by this level of contamination, which would force Rus Mining to either relocate or shut down the business, both are unacceptable costs for the proposed development.

The proposal states that cumulative annual average particulate matter is predicated to exceed assessment criteria. It should also be noted that the predicted 24-hour average is exceeded despite the site being active for a maximum of 13 hours a day. The argument that this is still acceptable as it is only a "minor exceedance" shows a frivolous attitude towards a control that exists to protect air quality for the safety of humans.

Site investigation uncovered that the site has significant amounts of Asbestos. The type of asbestos is labelled as Elevated Contaminants of CoPC above Human Health SAC. It is stated that there is likely that more asbestos containing material will be found on site. The type of asbestos material found on site is considered to have a moderate to high risk to human receptors, this considered with the unacceptable levels of dust that are forecast to be impacted upon Rus Mining Pty Ltd pose a serious health hazard to the employees of Rus Mining Pty Ltd. An issue as significant as this should include an Asbestos Management Plan to prove prior to approval that the site can be made and the processes that it will be made safe. There is a clear lack of consideration for Rus Mining Pty Ltd as a neighbouring site and the danger that the proposal has.

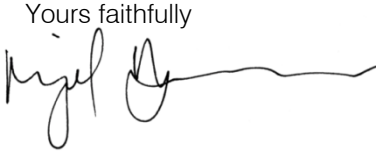
4. Conclusion

The proposal has unacceptable impacts upon the existing operation of Rus Mining which is located adjacent to the proposal. The consultant reports submitted as part of the Development Application make clear the adverse impacts that the development will have, but mitigation of these impacts falls desperately short. It is clear upon review of all submissions that there is a clear lack of understanding or thought to the impacts that the development will have on the surrounding land uses.

The proposal has a number of serious non-compliances with noise, air quality and pollutants. The impacts of these are serious and the proposal fails to mitigate these impacts. There is clear evidence that the site is unsuitable for such an intense industrial use. The proposal poses serious implications for the continuation of the business of Rus mining Pty Ltd and is incompatible with the character of Montore Road and the businesses that currently operate there.

It is for the reasons outlines above that the application is objected to.

Yours faithfully



Nigel Dickson
Managing Director
Dickson Rothschild

Our ref: PS119841-LTR-AQ-001

Your ref: SSD-5339

18 November 2020

Director - Industry Assessments
Planning and Assessment
Department of Planning, Industry and Environment
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To: Director - Industry Assessments

Re: Minto Waste and Resource Recovery Facility (SSD-5339) Environmental Impact Statement

Foamco Industries Pty Ltd (Foamco) has been manufacturing and distributing a range of polyurethane foam to a variety of businesses for more than 25 years. Its foam manufacturing facility in Sydney is located at 27 Pembury Road, Minto, NSW 2566, directly adjacent to the proposed Minto Waste and Resource Recovery facility at 7 Montore Road, Minto (Proposed Waste Facility). Foamco also currently occupies 16, 18, 20, 23, 25 and 26 Pembury Road, Minto. Its facility employs 52 people.

A key focus of Foamco's business is the supply of specialty products to the healthcare, audio and food/medical packaging sectors.

In the healthcare sector, Foamco creates high quality and highly functional healthcare products e.g. hospital mattresses, aged care and general medical mattresses These products are supplied into home healthcare, aged care, hospitals and other acute care markets and must be free of impurities including dust particles.

In the audio sector, these products are used in the packing of sensitive equipment.

In the packaging sectors, Foamco's products are used in the packaging of medical products and are used as food grade packaging.

For Foamco's products to be safe and fit for purpose, they must be completely sterile and free of dust. Consequently, Foamco's operations are particularly sensitive to the emission of dust and air pollution.

At all stages of the manufacturing process, the products are susceptible to contamination from dust and air pollution, in particular, during:

— The 24-hour curing period following foam production

— Foam cutting

— Foam covering for medical and aged care mattresses

— Packing of the product

— Outside unloading of liquid chemicals for foam production

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— outside truck loading of all covered and uncovered foam.

The quality of Foamco's products is key to the success of its business. Having undertaken a careful review of the EIS for the Proposed Waste Facility, our opinion is that the Proposed Waste Facility would endanger this.

Foamco has significant concerns over the siting of a resource recovery facility so close to Foamco's foam manufacturing plant (see Figure 1, Foamco facility shaded in blue) and the resulting potential to affect the quality of the products and impact on the health and welfare of its employees.

Should the Minister for Planning and Public Spaces grant permission for the Proposed Waste Facility in its current form, Foamco would be forced to seriously consider relocating or even closing its business. Either scenario would cost millions of dollars. Foamco would look to recover these costs, via an action against the proponent and/or by seeking financial assistance from the NSW Government.

The concerns that Foamco has about the Proposed Waste Facility are outlined in the following sections.

Figure 1 Location of Foamco Industries (shaded in blue) adjacent to the Proposed Waste Facility (outlined in red)

1. AIR QUALITY

The Proposed Waste Facility was declared as State significant development (SSD) and Secretary's Environmental Assessment Requirements (SEARS) have been issued for it on four occasions - 28 June 2012, 14 December 2014, 11 July 2017 and most recently 20 August 2020.

Regarding air quality, the SEARS require the Proposed Waste Facility proponent to assess:

'*air quality and odour — including:*

— *A quantitative assessment of the potential air quality and odour impacts for the development on the surrounding landowners and sensitive receptors;*

— *Construction and operational impacts, including dust generation from the transport of material; and*

— *Details of the proposed management and monitoring measures*'

WSP has reviewed the Air Quality Impact Assessment (AQIA)report (Concrete Recyclers Air Quality Impact Assessment, Report No. 12166-A, Version A, February 2019), which is part of the EIS for the Proposed Waste Facility, and make the following comments and questions in the section below.

1.1 REMEDIATION

Section 13 of the EIS document (*Site Contamination*) provides detail on the type and level of contamination at the site. It indicated that friable and bonded asbestos containing material (ACM) were identified in fill soils from the southern section of the site, including within two stockpiles.

The AQIA Report states:

'*Friable and bonded asbestos-containing materials (ACM) were identified in fill soils from the southern portion of the site, as well as within two stockpiles*'.

'*The EI (2020) additional investigation confirmed the presence of ACM in southern half of the site and delineated the areas of impact. It was concluded that the ACM posed a moderate to high risk to (future) human receptors. Remediation of the land was therefore necessary, in order for it to be suitable for the proposed (resource recovery facility) development*'.

The EI (2020) additional investigation report recommended preparation of a Remedial Action Plan (RAP) and an Asbestos Management Plan for the site. A RAP was prepared for the site and included as Appendix 15 of the EIS. Its objective '*is to guide remediation of the site, by providing detailed procedures that comply with relevant guidelines, yet prevent adverse effects on human and environmental receptors*'.

However, an Asbestos Management Plan was not included with the EIS. No explanation has been provided as to why an Asbestos Management Plan was omitted. An Asbestos Management Plan should be prepared, reviewed and approved.

Foamco are concerned about the presence of ACM during remediation works and any other works on site which have the potential to disturb ACM, particularly given its presence in the southern section of the site near Foamco's premises and the possible effect on the health and well-being of Foamco's employees. Some key questions regarding asbestos removal which remain unresolved by the EIS include:

— Where will asbestos monitoring take place? Will significant monitoring be conducted along southern boundary of the site, that adjoins Foamco's premises?

— What type of monitoring will occur? Environmental and/or occupational?

— What is the frequency of monitoring? How many samples?

— What are the monitoring procedures?

— Will an independent and adequately qualified consultant conduct the work?

Comprehensive monitoring should be required, including along the southern boundary of the site. In the interests of transparency and safety, there should be a requirement to share the results in a timely manner with adjoining landowners.

1.2 CONSTRUCTION

The AQIA Report did not address the potential impacts from construction of the Proposed Waste Facility, nor how they would be managed. In fact, air quality impacts during construction were not addressed in the AQIA Report at all which is not compliant with the SEARs as outlined above. Additionally, no air monitoring (asbestos and dust) has been proposed to demonstrate that construction works at the Proposed

Waste Facility would not have an impact beyond its site boundary i.e. impacting on Foamco's manufacturing facility, its products and employees.

Section 2.16 of the EIS document (*Sequence of Construction of the Proposal*) appears to be the only reference to construction activities, but this section provides no information about the construction schedule, the type and number of mobile plant machinery and trucks, the proposed construction timing or the proposed construction hours. Additionally, there is no mention of proposed management measures or monitoring during construction works.

As dust (including TSP, PM_{10} and $PM_{2.5}$) is likely to be generated during construction activities e.g. earthworks, which may impact on Foamco's activities and the quality of its foam products, the failure of the AQIA Report to address construction impacts is a significant shortcoming.

1.3 OPERATION

The EIS document indicates that small sections of the Proposed Waste Facility will be partially undercover and that there will be unsealed tracks and other surfaces within the Proposed Waste Facility. This does not reflect current best practice for waste recycling facilities, which requires that waste recycling operations occur within purpose-built enclosed and undercover facilities, on sealed surfaces.

If the Proposed Waste Facility is to proceed, the whole of the facility should be fully enclosed and all surfaces on which operations will occur should be sealed, in accordance with current best-practice.

In addition, the following key questions and issues regarding air quality impacts during operations remain unanswered by the EIS materials:

— Was the meteorological modelling conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA 2016)? If so, how?

— Why was the year 2017 chosen for the air dispersion modelling? Section 4.1.2 states '*Wind speed and direction during 2017 are generally representative of the five-year period and have therefore been adopted for assessment purposes*'. There is no detailed analysis of why 2017 was chosen rather than any of the other years.

— It is understood that the crushing and screening plant forming part of the Proposed Waste Facility would be housed inside a shed. How were these sources modelled i.e. as a point or volume source?

— It is also understood that a fogging system would be used to control dust from the crushing and screening plant. How effective is this system to manage dust generation? Crushing and screening operations are known to create high levels of dust.

— It seems that the crushing and screening plant is not fully enclosed, since conveyors would extend from the shed via 6 metre (m) high openings on the eastern and southern facades. However, air emissions from conveyors were not included as sources, so it appears that dust emissions from the conveyors have not been assessed.

— The sand washing plant forming part of the Proposed Waste Facility, which includes a generator and screens, was not included as an air emission source. Its omission potentially underestimates TSP, PM_{10} and $PM_{2.5}$ impacts at the Foamco facility (Industrial Receiver 3).

— It appears that there are several external conveyors (and possibly conveyor transfer points) used in waste stockpiling activities. However, they were not included as air emission sources, so it appears that dust emissions from these conveyors have not been assessed.

— The pug mill and the pug mill silo were not included as sources in the model. What was the reason for their exclusion? This appears to us to be a significant omission from the assessment with the potential to underestimate TSP, PM_{10} and $PM_{2.5}$ impacts at the Foamco facility.

— The AQIA Report states that, in the background atmosphere, 40% of the TSP is PM_{10}. However, the monitoring used for this statement (NSW Mineral Council 2000) was undertaken in the Hunter

Valley, which is a coal mining area known to have elevated background levels of PM_{10}, so how could this be regarded as representative? In the absence of site representative data, a more appropriate approach is to consider the relationship between TSP and PM_{10} concentrations and measured PM_{10} levels based on NSW EPA air quality impact assessment criteria. This relationship assumes that an annual average PM_{10} concentration of 25 µg/m^3 corresponds to an annual average TSP concentration of 90 µg/m^3. This equates to a background concentration of 56.5 µg/m^3 rather than the adopted concentration of 39.3 µg/m^3. This yields a cumulative concentration of 80.3 µg/m^3 at Foamco (Industrial Receiver 3 in the AQIA Report), which is almost 90% of the TSP assessment criterion. Activities at the proposed development are predicted to contribute 30% of the predicted TSP concentrations at Foamco which will adversely impact on Foamco's activities, the quality of its foam products and the health and welfare of its employees.

— The AQIA Report indicates exceedances were predicted for the annual average $PM_{2.5}$ (8.67 µg/m^3) and the 24-hour average PM_{10} (55.93 µg/m^3) assessment criteria at Industrial Receiver 3 (Foamco). In addition, the annual average predicted $PM_{2.5}$ ground level concentration (24.99 µg/m^3) is predicted to reach the assessment criterion of 25 µg/m^3. It is acknowledged that the annual average $PM_{2.5}$ background concentration contributes to a large component of the overall impact. However, for the 24 hour and annual PM_{10} ground level concentrations, site contributions are predicted to be 43% and 37% of the total impact respectively which is not insubstantial and will have an impact on the Foamco facility, the quality of its foam products and the health and welfare of its employees.

— The AQIA Report indicates that a contemporaneous assessment was undertaken for Industrial Receivers 1, 2 and 3 (Foamco). The graphs which depict the outcomes of that assessment (pages 21-36) indicate that predicted emissions from the Proposed Waste Facility cause an exceedance of the 24 hour $PM_{2.5}$ impact assessment criterion at all sensitive receivers in August 2017. This is not referred to in the text of the AQIA Report. Furthermore, the predicted PM_{10} emissions from the Proposed Waste Facility would cause the 50 µg/m^3 assessment criterion to be reached in March 2017 at sensitive receiver I2. Again, this is not mentioned in the AQIA Report and demonstrates both inadequacies in the assessment and the adoption of an approach which understates the extent of the adverse impact on the adjacent industrial receivers.

— The AQIA Report mentions only four proposed management measures. These measures alone will not ensure impacts at the Foamco premises are minimised. A whole suite of management and controls should have been included in the AQIA Report.

— An Air Quality Management Plan or a dust monitoring program was not proposed for the Proposed Waste Facility. A permanent and continuous dust monitor that measures PM_{10} and $PM_{2.5}$ should be placed along the southern boundary of the Proposed Waste Facility, given the predicted high particulate matter concentrations at the Foamco facility.

— Odour was not addressed in the AQIA Report, even though the SEARS specifically requests an assessment of potential odour impacts.

Overall, the air quality impacts from the Proposed Waste Facility have not been assessed adequately. Given that air quality impacts are one of the most significant issues for the Proposed Waste Facility, this indicates a fundamental deficiency in the EIS.

The air quality impacts from the Proposed Waste Facility should be reassessed to take account of the comments raised above. Foamco are concerned that impacts from a potentially high dust generating activity were not adequately addressed and that the proposed dust control measures are insufficient to ensure there are no unacceptable impacts, including on the Foamco manufacturing facility and its products and people.

2. NOISE

Regarding noise and vibration, the SEARs require the Proposed Waste Facility proponent to assess:

'*noise and vibration – including:*

— *A quantitative assessment of the potential construction, operational and transport noise and vibration impact; and*

— *Details of the proposed noise and vibration management and monitoring measures*'.

WSP has reviewed the Acoustic Impact Assessment report (Materials Recycling Facility, Noise Assessment, Report No. 12166-N, Version D, January 2019) (Acoustic Impact Report) and the following comments are made and questions asked in the section below.

— Section 4.4 of the Acoustic Impact Report indicates that predicted noise levels from the Proposed Waste Facility activities reach the NSW *Noise Policy for Industry* (NPfI) criterion of 70dBA at the northern, western and southern boundaries of the Proposed Waste Facility site. A 6 m high wall is proposed along the northern and western boundaries but not for the southern section of the site. This appears to be another significant omission from the EIS. Based on the modelling results in the Acoustic Impact Report, the Foamco facility will be the most adversely affected industrial receiver from site activities at the Proposed Waste Facility will adversely impact on the health and wellbeing of our employees. At the very least, the Proposed Waste Facility should include the construction of a noise wall along the southern boundary.

— Construction noise levels at sensitive receivers (including Foamco's facility) were not assessed. Please explain why?

— There are no management measures nor noise monitoring proposed during operational activities for the Proposed Waste Facility, which is contrary to the SEARs. Please explain why?

— A Noise and Vibration Management Plan was not proposed for the Proposed Waste Facility, which is contrary to the SEARs. Please explain why?

As is the case with the air quality assessment, the omissions in the noise assessment are significant and demonstrate a major failing in the EIS.

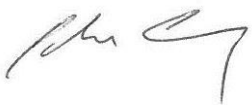
3. CONCLUSION

In its currently proposed form, the Proposed Waste Facility does not reflect current best practice for waste recycling facilities, which requires that waste recycling operations occur within purpose-built enclosed and undercover facilities, on sealed surfaces.

A review of the AQIA Report and the Acoustic Impact Report clearly indicates that both reports lack clarity in assessment approach or consistency in conclusions and recommendations. In addition, there is minimal reference to proposed management measures during both construction and operation and no proposed monitoring during operation of the Proposed Waste Facility. Foamco requests that the air quality and noise assessments are redone to take account of the comments made in this submission and to address the significant issues and questions which have been left unanswered. Without proper air quality and noise assessments, there cannot be any reasonable basis for approving the Proposed Waste Facility,

The siting of the Proposed Waste Facility, in its current form, adjacent to the Foamco facility, will have a significant detrimental effect on Foamco's business and may force it to relocate at significant cost or even close its business. Either scenario would cost millions of dollars. Foamco would look to recover these costs either via an action against the proponent and/or by seeking financial assistance from the NSW Government.

Yours sincerely



John Conway
Air Quality (Senior Principal)

Director - Industry Assessments
Planning and Assessment
Department of Planning , Industry and Environment
Locked Bag 5022
PArramatta NSW 2124

To: Director - Industry Assessments

Re: Minto Waste and Resource Recovery Facility (SSD-5339) Environmental Impact Statement

Austex Dies Pty Ltd has been manufacturing dies for aluminium extrusion for over 40 years.

The company is located at 13 Montore rd, Minto 2566, just 100 meters away from the proposed Minto Waste and Resource Recovery facility at 7 Montore Road, Minto.

We employ 25 people and our customer are in Australia and New Zealand.

We are a major supplier for building, medical, transport and defence industry.

The quality of Austex Dies products is key to the success of its business and this proposed development would endanger this.

As such, Austex Dies has significant concerns over the siting of a resource recovery facility so close to the manufacturing with the potential to affect the quality of the products and impact on the health and welfare of its employees. Should the Department of Planning, Industry and Environment (DPIE) grant permission for this proposed development, Austex Dies would be forced to seriously consider relocating or even closing its business permanently. Either scenario would cost millions of dollars and therefore the costs would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The concerns that Austex Dies has about this proposed development are outlined in the following sections.

AIR QUALITY

The proposed Minto Waste and Resource Recovery facility was designated a State Significant Development (SSD) and issued Secretary's Environmental Assessment Requirements (SEARs). Regarding air quality, the following SEARs are applicable:

'*air quality and odour – including:*

A quantitative assessment of the potential air quality and odour impacts for the development on the surrounding landowners and sensitive receptors;

Construction and operational impacts, including dust generation from the transport of material; and

Details of the proposed management and monitoring measures'

Austex Dies has reviewed the Air Quality Impact Assessment (AQIA) report (Concrete Recyclers Air Quality Impact Assessment, Report No. 12166-A, Version A, February 2019) and makes the following comments and questions in the section below.

REMEDIATION

Section 13 *Site Contamination* of the EIS provides detail on the type and level of contamination at the site. It indicated that friable and bonded asbestos containing material (ACM) were identified in fill soils from the southern section of the site, including within two stockpiles.

The report states:

'*Friable and bonded asbestos-containing materials (ACM) were identified in fill soils from the southern portion of the site, as well as within two stockpiles'.*

'The EI (2020) additional investigation confirmed the presence of ACM in southern half of the site and delineated the areas of impact. It was concluded that the ACM posed a moderate to high risk to (future) human receptors. Remediation of the land was therefore necessary, in order for it to be suitable for the proposed (resource recovery facility) development'.

The EI (2020) additional investigation report recommended preparation of a Remedial Action Plan (RAP) and an Asbestos Management Plan for the site. A RAP was prepared for the site and included as Appendix 15 of the EIS. Its objective '*is to guide remediation of the site, by providing detailed procedures that comply with relevant guidelines, yet prevent adverse effects on human and environmental receptors*'.

However, an Asbestos Management Plan was not included with the EIS. Why not? A plan to manage and monitor asbestos would provide confidence in the proposed remediation process.

Austex Dies is concerned about the presence of ACM during remediation works particularly given its presence in the southern section of the site and the possible effect on the health and well-being of its employees. Some questions regarding asbestos removal include:

Where will monitoring take place?

What type of monitoring will occur? Environmental and/or occupational?

Frequency of monitoring? How many samples?

What are the monitoring procedures?

What company will conduct the work?

CONSTRUCTION

The AQIA did not address the potential impacts from construction nor how they would be managed. In fact, air quality impacts during construction were not addressed in the AQIA report at all which is not compliant with the SEARs requirements as outlined above. Additionally, no air monitoring (asbestos and dust) has been proposed to demonstrate that construction works at the proposed development would not have an impact beyond its site boundary i.e. impacting on Austex's manufacturing facility and its products.

Section 2.16 *Sequence of Construction of the Proposal* of the Environmental Impact Statement (EIS) for the proposed development appears to be the only reference to construction activities but provides no information about the construction schedule, type and number of mobile plant machinery and trucks, timing and hours of operation. Additionally, there is no mention of proposed management measures or monitoring during construction works.

As dust (PM_{10} and $PM_{2.5}$) is likely to be generated during construction activities which may impact on Austex Dies, it is remiss of Camolaw Pty Ltd that the AQIA report does not address construction impacts.

OPERATION

Austex Dies has the following questions regarding air quality impacts during operations:

Was the meteorological modelling conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA 2016)? If so, how?

Why was the year 2017 chosen for the air dispersion modelling? Section 4.1.2 states '*Wind speed and direction during 2017 are generally representative of the five-year period and have therefore been adopted for assessment purposes*'. There is no detailed analysis of why 2017 was chosen rather than any of the other years.

It is understood the crushing and screening plant would be housed inside a shed. How were these sources modelled? It understood a fogging system would be used to control dust. How effective is this system to manage dust generation? Crushing and screening operations are known to create high levels of dust.

It seems that the crushing and screening plant is not fully enclosed with conveyors extending from the shed via 6 metre (m) high openings on the eastern and southern facades. Air emissions from conveyors were not included as sources. Please explain why? Are they proposed to be covered?

The sand washing plant which includes a generator and screens was not included as an air emission source. Please explain why?

It appears that there are several external conveyors (and possibly conveyor transfer points) used in stockpiling activities. However, they were not included as air emission sources. Please explain why?

The pug mill and the pug mill silo were not included as sources in the model. What was the reason for their exclusion?

A contemporaneous assessment was undertaken for Industrial Receivers 1, 2 and 3. The graphs indicate that predicted emissions from the site cause an exceedance of the 24 hour $PM_{2.5}$ impact assessment criterion at all sensitive receivers in August 2017. This is not referred to in the AQIA report. Furthermore, predicted PM_{10} emissions from the proposed development cause the 50 $\mu g/m^3$ assessment criterion to be reached in March 2017 at sensitive receiver I2. Again, this is not mentioned in the AQIA report.

The AQIA report mentions only four proposed management measures. These measures alone will not ensure impacts at Austex Dies are minimised. A whole suite of management and controls should have been included in the report.

An Air Quality Management Plan or a dust monitoring program was not proposed for the development. A permanent and continuous dust monitor that measures PM_{10} and $PM_{2.5}$ should be placed along the southern boundary of the proposed development given the predicted high particulate matter concentrations at the Austex Dies facility.

While not expected to be a potential issue, odour was not addressed in the AQIA report. The SEARS specifically requests an assessment of potential odour impacts.

Overall, Austex Dies consider that the air quality impacts from the proposed development should be re-assessed to take account of the comments raised in the sections above. Austex Dies are concerned that impacts from a potentially high generating dust activity were not adequately addressed and that the proposed dust control measures are insufficient to ensure there are no impacts to the Austex Dies manufacturing facility and its products.

NOISE

Regarding noise and vibration, the following SEARs are applicable:

'*noise and vibration – including:*

A quantitative assessment of the potential construction, operational and transport noise and vibration impact; and

Details of the proposed noise and vibration management and monitoring measures'.

Austex Dies has reviewed the Acoustic Impact Assessment report (Materials Recycling Facility, Noise Assessment, Report No. 12166-N, Version D, January 2019) and makes the following comments and questions in the section below.

Section 4.4 indicates that predicted noise levels from site activities reaches the NSW *Noise Policy for Industry* (NPfI) criterion of 70dBA. A 6 m high wall is proposed along the northern and western boundaries but not for the southern section of the site. Please explain the reason for this.

Construction noise levels at sensitive receivers were not assessed. Please explain why?

There are no management measures proposed nor noise monitoring during operational activities. Please explain why?

A Noise and Vibration Management Plan was not proposed for the site. Please explain why?

CONCLUSION

A review of the Air Quality and Noise Impact Assessment reports conclude that both reports lack clarity in assessment approach. In addition, there is minimal reference to proposed management measures during both construction and operation and no proposed monitoring during operation of the proposed development. Austex Dies requests that the air quality and noise assessments are re-assessed to take account of the comments made in this submission and address the questions.

The siting of the proposed development close to the Austex Dies facility will have a detrimental effect on its business and likely force it to relocate at huge cost or even close its business permanently. The cost incurred towards this exercise would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The quality of its product is key to the success of Austex Dies. Activities at the proposed Minto Waste and Resource Recovery development could compromise this quality.

Yours sincerely

Alessandro Ferrari

Austex Dies

General Manager

[redacted]

[redacted]

Submission for: Minto Resource Recovery Facility

Objects

Deco Australia Pty Ltd

MINTO, New South Wales

Message

My name is Ross Doonan and I am the owner of the business Deco Australia Pty Ltd, which is located on the corner of Airds Road and Montore Road Minto, as well as the property at 66-77 Airds Road Minto. Our business is the manufacture and finishing of fire safe architectural building products, as well as a range of surface finishing for industrial applications.

I have recently invested over $500,000 in developing a display centre right on the corner of Airds Road and Montore Road for our products, to communicate with our customers who are builder, developers, architects and home owners.

I object to this proposed development for a number of reasons. This type of low end business will have an adverse impact on the value of my business and the property, it will create safety risks for my 100+ staff when they come to and from work, and it will make visiting our business hazardous and unpleasant for our customers.

The traffic report says that there will be approximately one truck movement per minute! The noise generated by this many trucks will be relentless, and directly conflicts with the high end profile of our business, products and finishes. Our finishing operations include powder coating and anodising, and the control of airborne dust generated by this large number of truck movements , is a major concern for our business.

Many trucks park along Airds Road close to Montore Road, which restricts visibility for vehicles turning

from Montore Road onto Airds Road, creating a serious safety issue. The current give way sign is ignored by vehicles, so if this huge number of trucks is to be controlled, then a roundabout or traffic lights will be required on the corner of Airds Road and Montore Road. Our business has an access gate in Montore Road, and our staff use this gate to enter and leave our carpark. I am very concerned about the safety of my staff having to contend with such a large number of heavy trucks on a daily basis.
The high value fire safe building products sold by Deco are "beautiful and durable", and our new display centre has been designed to provide a pleasant and enjoyable experience for our customers to explore our wide range of products. The noise generated from such a huge number of trucks turning into and out of Montore Road, will destroy the ambiance of this site in which we have invested heavily. I note that only around 25 jobs are involved with this waste disposal centre, whereas my business employs 100 + people, who's future will be placed at risk because of this proposed development.
Deco Australia strongly opposes this proposed development because it will devalue our business and create a safety hazard for our staff.

Submission for: Minto Resource Recovery Facility

Objects

Quality Acoustics

MINTO, New South Wales

Message

Minto Resources Recovery Facility (SSD-5339)

I object to this project going ahead in the street for the follow reasons

RE SALE value of every property in Montore Road will be EXTREMELY diminished due to this Resource Recovery Facility - can the NSW Government Guarantee that the value of our properties will remain the same once the Resource Facility is opened - will we be compensated if the value of the property diminishes?
Once people are aware that this facility is located in this street people will look elsewhere to Rent/Purchase .

The amount of trucks entering and leaving Montore Road will be excessive - The Road is not designed for this amount of traffic or trucks of this size
We believe that there is not enough area in the waiting bay to ensure the trucks are all off the road prior to being unloaded
Due to the Dog Leg in the road if a truck is pulling out of the facility and trucks are lined up to go in it causes a blind spot - people who are turning right to come down to the end of Montore Road will be at

risk of collision
The T intersection at Montore and Airds Road is not designed to take this amount of traffic turning in and out of this street - there is a blind spot at times when turning right out of Montore road if trucks are parked close to the corner - Existing Montore Road at times is already quite difficult during peak times due to traffic currently using Airds Road
The amount of truck movement into Montore Road is already quite heavy along with cars parked along the street would be make movement in and out difficult

Dust - due to the low lying area dust will remain in the air due to the material that is being dumped at the facility
Filtration of the plant - will not be enough to prevent dust from entering the air and causing health concerns for people breathing issues -

Environmental Affects of the Resource Facility in this area - not only the Dust but the Fumes from the Trucks and Machinery - This site is located in a low lying area

Noise - Has Acoustics Testing been carried out for the noise of the facility and also the traffic and road use - the noise from the trucks and the Resource facility will be in excess of what is acceptable

The main arterial roads leading in and out of Montore Road are already extremely busy with heavy and light trucks - has a Traffic management survey been completed advising the impact - long term issues and issues that this amount of traffic will cause - Environmental and Health Affects

Once facility is opened and the proper testing is carried out to show what affects the facility is really having on the Environment in regards to noise and dust - then it is to late for us to do anything about it

These types of facilities should be located where it will not impact any other Business and cause environmental and health concerns to workers and residents

One of the long term effects of this facility in this area will be see Business close

NSW State Government has to relook at what they a proposing and look to relocate this Facility to another area which would be more suitable

I look forward to hearing from you with a response shortly

Regards

Jennine Nocera

Submission for: Minto Resource Recovery Facility

Objects

Redox Pty Ltd

MINTO, New South Wales

Message

Redox Pty Ltd has at its Swettenham Road site ("Site") consent conditions concerning the testing of storm water before it is allowed to be released into Bow Bowing Canal. Turbidity amongst other items is tested and the results are audited by biennial audits also mandated by consent conditions. It is feared that dust from off site originating at the Recovery Facility will negatively impact on this Site by increasing turbidity and affecting the water test results causing issues that could results in additional costs to remediate retained storm water or additional costs in site cleaning.

Redox stores on this Site a range of food and pharmaceutical grade chemical products. Dust from the Recovery Facility will find its way into the warehouses and settle on the packages of chemicals rendering them unsuitable for supply to food/pharmaceutical manufacturers without further cleaning or other additional costs prior to delivery.

GLYSON ENTERPRISES PTY LTD
T/AS TAI CHEONG FOODS

21 PEMBURY ROAD MINTO NSW 2566
T: 02 9603 8688 | F: 02 9603 8188
ABN 61 167 629 183

17th November 2020

Director - Industry Assessments
Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

To: Director - Industry Assessments

Re: Minto Waste and Resource Recovery Facility (SSD-5339) Environmental Impact Statement

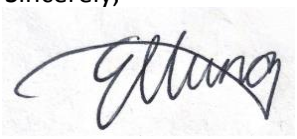
Glyson Enterprises Pty Ltd trading as Tai Cheong Foods is a food wholesale, storage and distribution business servicing both local and regional restaurants in NSW currently located at 21 Pembury Road Minto NSW 2566. It is located within a close vicinity to the proposed Minto Waste and Resource Recovery facility at 7 Montore Road, Minto.

As a food distribution business Food Safety is our concern. Despite having procedures and programs in place to ensure food products are kept compliant and to minimalize biological, chemical and physical hazards, the increase dust and air pollution from the proposed Facility will impact this.

Tai Cheong Foods receive and store raw materials and dispatch raw ingredients and with the Minto Waste and Resource Recovery Facility being of close vicinity to our business there is the concern that airborne dust particles will have the potential to compromise the quality of our products and impact on the health and welfare of our employees.

With these reasons we object to the proposal of Minto Waste and Resource Recovery Facility to be located at 7 Montore Road, Minto NSW 2566.

Sincerely,



Elyssa Hung
Director

Director - Industry Assessments
Planning and Assessment
Department of Planning , Industry and Environment
Locked Bag 5022
PArramatta NSW 2124

To: Director - Industry Assessments

Re: Minto Waste and Resource Recovery Facility (SSD-5339) Environmental Impact Statement

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We are a major supplier for building, medical, transport and defence industry.

The quality of Austex Dies products is key to the success of its business and this proposed development would endanger this.

As such, Austex Dies has significant concerns over the siting of a resource recovery facility so close to the manufacturing with the potential to affect the quality of the products and impact on the health and welfare of its employees. Should the Department of Planning, Industry and Environment (DPIE) grant permission for this proposed development, Austex Dies would be forced to seriously consider relocating or even closing its business permanently. Either scenario would cost millions of dollars and therefore the costs would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The concerns that Austex Dies has about this proposed development are outlined in the following sections.

AIR QUALITY

The proposed Minto Waste and Resource Recovery facility was designated a State Significant Development (SSD) and issued Secretary's Environmental Assessment Requirements (SEARs). Regarding air quality, the following SEARs are applicable:

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A quantitative assessment of the potential air quality and odour impacts for the development on the surrounding landowners and sensitive receptors;

Construction and operational impacts, including dust generation from the transport of material; and

Details of the proposed management and monitoring measures'

Austex Dies has reviewed the Air Quality Impact Assessment (AQIA) report (Concrete Recyclers Air Quality Impact Assessment, Report No. 12166-A, Version A, February 2019) and makes the following comments and questions in the section below.

REMEDIATION

Section 13 *Site Contamination* of the EIS provides detail on the type and level of contamination at the site. It indicated that friable and bonded asbestos containing material (ACM) were identified in fill soils from the southern section of the site, including within two stockpiles.

The report states:

'*Friable and bonded asbestos-containing materials (ACM) were identified in fill soils from the southern portion of the site, as well as within two stockpiles'.*

'The EI (2020) additional investigation confirmed the presence of ACM in southern half of the site and delineated the areas of impact. It was concluded that the ACM posed a moderate to high risk to (future) human receptors. Remediation of the land was therefore necessary, in order for it to be suitable for the proposed (resource recovery facility) development'.

The EI (2020) additional investigation report recommended preparation of a Remedial Action Plan (RAP) and an Asbestos Management Plan for the site. A RAP was prepared for the site and included as Appendix 15 of the EIS. Its objective '*is to guide remediation of the site, by providing detailed procedures that comply with relevant guidelines, yet prevent adverse effects on human and environmental receptors*'.

However, an Asbestos Management Plan was not included with the EIS. Why not? A plan to manage and monitor asbestos would provide confidence in the proposed remediation process.

Austex Dies is concerned about the presence of ACM during remediation works particularly given its presence in the southern section of the site and the possible effect on the health and well-being of its employees. Some questions regarding asbestos removal include:

Where will monitoring take place?

What type of monitoring will occur? Environmental and/or occupational?

Frequency of monitoring? How many samples?

What are the monitoring procedures?

What company will conduct the work?

CONSTRUCTION

The AQIA did not address the potential impacts from construction nor how they would be managed. In fact, air quality impacts during construction were not addressed in the AQIA report at all which is not compliant with the SEARs requirements as outlined above. Additionally, no air monitoring (asbestos and dust) has been proposed to demonstrate that construction works at the proposed development would not have an impact beyond its site boundary i.e. impacting on Austex's manufacturing facility and its products.

Section 2.16 *Sequence of Construction of the Proposal* of the Environmental Impact Statement (EIS) for the proposed development appears to be the only reference to construction activities but provides no information about the construction schedule, type and number of mobile plant machinery and trucks, timing and hours of operation. Additionally, there is no mention of proposed management measures or monitoring during construction works.

As dust (PM_{10} and $PM_{2.5}$) is likely to be generated during construction activities which may impact on Austex Dies, it is remiss of Camolaw Pty Ltd that the AQIA report does not address construction impacts.

OPERATION

Austex Dies has the following questions regarding air quality impacts during operations:

Was the meteorological modelling conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA 2016)? If so, how?

Why was the year 2017 chosen for the air dispersion modelling? Section 4.1.2 states '*Wind speed and direction during 2017 are generally representative of the five-year period and have therefore been adopted for assessment purposes*'. There is no detailed analysis of why 2017 was chosen rather than any of the other years.

It is understood the crushing and screening plant would be housed inside a shed. How were these sources modelled? It understood a fogging system would be used to control dust. How effective is this system to manage dust generation? Crushing and screening operations are known to create high levels of dust.

It seems that the crushing and screening plant is not fully enclosed with conveyors extending from the shed via 6 metre (m) high openings on the eastern and southern facades. Air emissions from conveyors were not included as sources. Please explain why? Are they proposed to be covered?

The sand washing plant which includes a generator and screens was not included as an air emission source. Please explain why?

It appears that there are several external conveyors (and possibly conveyor transfer points) used in stockpiling activities. However, they were not included as air emission sources. Please explain why?

The pug mill and the pug mill silo were not included as sources in the model. What was the reason for their exclusion?

A contemporaneous assessment was undertaken for Industrial Receivers 1, 2 and 3. The graphs indicate that predicted emissions from the site cause an exceedance of the 24 hour $PM_{2.5}$ impact assessment criterion at all sensitive receivers in August 2017. This is not referred to in the AQIA report. Furthermore, predicted PM_{10} emissions from the proposed development cause the 50 $\mu g/m^3$ assessment criterion to be reached in March 2017 at sensitive receiver I2. Again, this is not mentioned in the AQIA report.

The AQIA report mentions only four proposed management measures. These measures alone will not ensure impacts at Austex Dies are minimised. A whole suite of management and controls should have been included in the report.

An Air Quality Management Plan or a dust monitoring program was not proposed for the development. A permanent and continuous dust monitor that measures PM_{10} and $PM_{2.5}$ should be placed along the southern boundary of the proposed development given the predicted high particulate matter concentrations at the Austex Dies facility.

While not expected to be a potential issue, odour was not addressed in the AQIA report. The SEARS specifically requests an assessment of potential odour impacts.

Overall, Austex Dies consider that the air quality impacts from the proposed development should be re-assessed to take account of the comments raised in the sections above. Austex Dies are concerned that impacts from a potentially high generating dust activity were not adequately addressed and that the proposed dust control measures are insufficient to ensure there are no impacts to the Austex Dies manufacturing facility and its products.

NOISE

Regarding noise and vibration, the following SEARs are applicable:

'*noise and vibration – including:*

A quantitative assessment of the potential construction, operational and transport noise and vibration impact; and

Details of the proposed noise and vibration management and monitoring measures'.

Austex Dies has reviewed the Acoustic Impact Assessment report (Materials Recycling Facility, Noise Assessment, Report No. 12166-N, Version D, January 2019) and makes the following comments and questions in the section below.

Section 4.4 indicates that predicted noise levels from site activities reaches the NSW *Noise Policy for Industry* (NPfI) criterion of 70dBA. A 6 m high wall is proposed along the northern and western boundaries but not for the southern section of the site. Please explain the reason for this.

Construction noise levels at sensitive receivers were not assessed. Please explain why?

There are no management measures proposed nor noise monitoring during operational activities. Please explain why?

A Noise and Vibration Management Plan was not proposed for the site. Please explain why?

CONCLUSION

A review of the Air Quality and Noise Impact Assessment reports conclude that both reports lack clarity in assessment approach. In addition, there is minimal reference to proposed management measures during both construction and operation and no proposed monitoring during operation of the proposed development. Austex Dies requests that the air quality and noise assessments are re-assessed to take account of the comments made in this submission and address the questions.

The siting of the proposed development close to the Austex Dies facility will have a detrimental effect on its business and likely force it to relocate at huge cost or even close its business permanently. The cost incurred towards this exercise would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The quality of its product is key to the success of Austex Dies. Activities at the proposed Minto Waste and Resource Recovery development could compromise this quality.

Yours sincerely

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