



11 August 2017

Attention:
Office of Planning and Environment
320 Pitt St, Sydney
NSW 2000

Dear Nick

RE: Bingo Minto Waste Resource Recovery Proposal

Origin would like to submit an objection to the proposal by Bingo Resources to increase the Bingo Minto Resource Recovery operations from 30,000 tonnes per annum to 220,000 tonnes per annum. Our objections are on both safety and environmental grounds and are associated with additional traffic and dust generated from the project.

Origin believe the current operation is not suited to the industrial estate, and will cause significant additional issues if volumes were to be increased as proposed.

Justification for the objection is outlined in the Attachment 1.

Should you have any questions or concerns, please do not hesitate to contact the undersigned on (02) 97656477 or by email John.Harris2@originenergy.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "John Harris", with a long horizontal flourish extending to the right.

John Harris
Minto Terminal Manager
26 Pembury Rd, NSW, 2566

Attachment 1 Origin Submission

Contents

1. Introduction	3
2. Traffic and Transport Impacts.....	3
2.1. Existing Operational traffic impacts	3
2.2. Transport Impact Assessment.....	7
3. Air Quality	8
3.1. Management of Asbestos waste	9
4. Impacts to Bow Bowling Creek.....	10
5. Conclusion	11

Figures

<i>Figure 1 A reversing truck blocking the street while trying to access the site</i>	5
<i>Figure 2 A truck entering the site, note general access is from the opposite direction</i>	5
<i>Figure 3 Examples of trucks reversing and undertaking a multi-point turn and almost jack-knifing to turn around in the cul de sac at the end of Pembury Street</i>	6
<i>Figure 4 The Bingo street sweeper driving down the middle of the road. Also, note the poor road conditions due to the ineffectiveness of the cleaning</i>	7
<i>Figure 5 Table from the Traffic impact assessment outlining the predicted Vehicle Movements</i>	8
<i>Figure 6 Cars in Pembury Road covered in dust from bingo's operation</i>	9
<i>Figure 7 Dust settled on a car at the Origin terminal several hundred metres down the road</i>	9
<i>Figure 8 Sediment from the road in the stormwater drain and entering Bow Bowling Creek</i>	10

1. Introduction

Origin Energy (ASX: ORG) is a leading Australian integrated energy company.

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.

Origin Energy would like to make a submission regarding the proposed expansion of the Bingo Resource Recovery facility. Origin is concerned that the scale of and intensity of the proposed expansion of the facility is not consistent with the existing industrial uses within the industrial estate. Our concerns stem largely from the very significant increase to traffic movements that will result from the increase in intensity of operations and the impact this would have on the health and safety of employees of Origin, and the surrounding businesses.

The increase to 220,000 tonnes is a seven-fold increase to the current processing permitted at the Bingo site. The current Bingo site activities are already putting stress on the infrastructure and surrounding industry estate. Origin make this submission with attached photos as evidence of the existing operations.

Origin have significant concerns for impacts to the health and safety and continuing efficiency of our operation. Specifically; the increase of heavy vehicle traffic on the local road network capacity will impact the efficient operation of our LPG fleet. As detailed below, significant queuing of heavy vehicles is currently experienced on Pembury Road, without a seven-fold increase in capacity.

. Origin identifies the following aspects that are of concern and are not adequately addressed in the current submission:

- Traffic and Transport
- Air quality
- Management of Asbestos waste
- Stormwater runoff

2. Traffic and Transport Impacts

Origin has identified a number of matters of concern with Bingo's current operation that are outlined below that lead to safety issues for the local road users.

2.1. Existing Operational traffic impacts

Trucks have been observed parked along Pembury Road and Airds Road outside Bingo site operating hours. The trucks tend to block the road, limiting visibility creating safety issues when vehicles attempt to pass.

There are several concerns with visibility:

- Parked trucks leave their lights on resulting in a safety risk as drivers are temporarily blinded when travelling in the opposite direction.

- Safety of pedestrian moving between the truck to cross the road or access the local café and the risk of being hit by a passing vehicle.

In many cases trucks are forced to stop in the middle of the road and wait to enter the Bingo site, or move from one gate to another effectively blocking the street (Figure 1 and Figure 2). Currently B Doubles need both sides of the road to access/exit the Bingo Facility. At this point, the view of Origin is that this is not an issue. However with an increase of 376 truck movements in and out of the site per day, there is not only a safety concern, but concern that the amount of traffic will start to impact on Origin's operations potentially interrupting business because of the inability of Origin related vehicles to access the Origin site.

On most working days parking in Pembury Street is generally full on either side of the road throughout the day. Trucks, in many cases B-Doubles, are held up at the gate and will either line up down the road, or drive to the end of the street and undertake a multi-point turn at the at the end of Pembury Street. Both cul de sacs in the street, generally have parked cars so the Bingo trucks struggle to turn or are required to reverse (Figure 3).The cul de sac has Origin LPG delivery trucks entering and leaving throughout the day. It is important that the delivery trucks have a safe route to and from the Origin site.

Bingos trucks have been observed arriving to the site uncovered, and debris seen on the street. Bingo employs a street sweeper that is almost constantly operating to remove the dirt and dust that has settled on the road. The street sweeper and operator poses a safety issues by travelling down the middle of the road without regard for other road users, randomly does u-turns and pulls out in front of vehicles, including Origin vehicles. This adds to street congestion and is ineffective with mud left on the road resulting in slippery and dangerous conditions.

The table in Figure 5 states that Bingo's existing two-way truck movements are 88 per day for the Waste Facility, increasing to 464 two-way vehicles movements per day. The existing road infrastructure does not handle the current traffic load of 88 movements per day, therefore an increase by 376 movements will create further safety hazards and impede movements of other vehicles. The increased traffic will negatively impact on Origins access and overall business.

Figure 1 A reversing truck blocking the street while trying to access the site



Figure 2 A truck entering the site, note general access is from the opposite direction



Figure 3 Examples of trucks reversing and undertaking a multi-point turn and almost jack-knifing to turn around in the cul de sac at the end of Pembury Street



Figure 4 The Bingo street sweeper driving down the middle of the road. Also, note the poor road conditions due to the ineffectiveness of the cleaning



2.2. Transport Impact Assessment

The Bingo Resource Recovery Facility, Transport Impact Assessment presented addresses the wider traffic impacts to get into the Industrial Estate but lacks details on traffic management on the access to Bingo from Pembury Street. It also considers a number of other traffic related issues including a traffic controller within the property, staff parking and stacking of trucks on site, however it fails to address issues with other operations in the Pembury Road precinct.

Origin recognises that longer operating hours will spread the traffic over a longer period, but will not address the number of trucks lined up waiting at 6am. Even the traffic report recognises that the longer business hours would only “slightly ameliorate traffic activity and somewhat mitigate impacts on the surrounding road network”. In essence the report doesn’t address the safety concerns, or truck parking in the street while waiting access the site.

The impact assessment indicates that vehicles accessing the street constitute “delivery trucks and cars”, and does not consider that B Double trucks are a large part of the operation. In addition, the truck stacking model on site only appears to have room for one B Double or semi-trailer on site whereas observations suggest that in reality there are many more accessing the site. Vehicles currently stage offsite so this will only worsen the impact to the street.

The expansion proposal assessment states that all staging will take place within the Bingo Property, however currently the property cannot handle the existing traffic volume. The impact assessment states that stacking of trucks on site will be an option, however the size of the property will not change and stacking is not currently effective. The assessment has not demonstrated that the increased traffic volume to the Bingo site can be appropriately managed.

Figure 5 Table from the Traffic impact assessment outlining the predicted Vehicle Movements

Table 10: Future Vehicle Movements

Period	Vehicle Movements (one-way)	Vehicle Movements (two-way)	Waste (tonnes)
Inbound waste			
Per year	63,960	127,920	220,000
Per week	1,230	2,460	4,231
Per day (six-day week)	205	410	705
Outbound waste			
Per year	8,424	16,848	209,410
Per week	162	324	4,027
Per day (six-day week)	27	54	671
Total Average (per day)	232	464	1,376

As given in Table 2, the existing waste transfer facility generates an average of 88 two-way vehicle movements per day. As outlined in Table 10, the proposed facility is estimated to generate an average of 464 two-way vehicle movements per day. Therefore, the future facility would generate an additional 376 daily two-way movements, on average, which equates to 188 vehicles.

3. Air Quality

The Bingo Resource Recovery Facility, Air Quality Impact Assessment states that dust is managed using a “Coolmist” dust system which was recently upgraded. The design includes overhead and doorways mist system designed to suppress the dust by encapsulating the particles and dropping them from the air. The suppression system also includes sprinklers across the yard.

The impact assessment uses modelling to determine the future impacts. No dust monitoring data was available for the Project Site therefore potential emissions were used for modelling. An estimation has been based on data from the NPI for Mining and the USEPA AP42 rather than actual on ground monitoring of the existing impacts.

It is evident that the upgraded system is ineffective in its current format as dust settles on road and cars parked in the street. The dust deposition on the cars is demonstrated by the photographs in Figure 6. The photo in Figure 7 shows dust deposition on a vehicle parked at the Origin Terminal hundreds of metres down the road. There is no reason to not assume that the amount of dust will increase substantially if the expansion of the Bingo facility is approved.

The current EPA licence states that “Activities must be carried out in a manner that minimises the generation of dust from the premises”. Figures 6 and 7 provides evidence that facility struggles to comply with its current licence condition using the existing dust suppression system. As this system is not being upgraded or modified with the increased waste volume, dust emissions from the site will be have significant safety and environmental impacts.

3.1. Management of Asbestos waste

The Air Quality Impact Assessment for the expansion of the Bingo site states that if there is asbestos in a load, it will 'not permitted to be kept on site will either be rejected at the eastern weigh bridge or within the processing area and subsequently reloaded before leaving the site'. This is likely to result in the handling of asbestos at the Bingo site.

If the asbestos is not handled properly, there is potential for asbestos particles to enter the air and pose a risk to workers. There is little information in Bingo's assessments as to how asbestos that brought to site will be handled besides stating that it will be removed. Given the amount of dust in the air, this raises concerns for potential health impacts for the surrounding workers.

Figure 6 Cars in Pembury Road covered in dust from bingo's operation



Figure 7 Dust settled on a car at the Origin terminal several hundred metres down the road



4. Impacts to Bow Bowling Creek

The Bingo Soil and Water Assessment for the proposed expansion is limited to examining how sediment is controlled on site, but does not explore the accumulation of dust off –site, nor the limitations of the street cleaning system employed to presumably limit sediment entering the stormwater drain and then Bow Bowling Creek.

Currently, the facility's existing dust suppression system is not working effectively and the dust settles on the road hence the need for the street sweeper. The street sweeper is ineffective therefore sediment can be seen in the drain directly from the road. Figure 8 shows sediment coming from the street, seen in the background, then entering Bow Bowling Creek.

Arguably, the proposed expansion will increase the amount of dust associated with the Bingo site and such dust may continue to settle on the road exacerbating the sediment entering the creek.

Figure 8 Sediment from the road in the stormwater drain and entering Bow Bowling Creek



5. Conclusion

While Origin is generally supportive of sustainable local business operations, we hold serious concerns about the proposed expansion of the Bingo Resource Recovery Centre. The various assessments submitted as part of the application for expansion fail to appropriately demonstrate how impacts arising from the proposed expansion will be managed. Origin has significant health, safety and environmental concerns with the proposed increase in operations of Bingo Resource Recovery, namely:

- the scale of and intensity of the proposed expansion of the facility is not consistent with the existing industrial uses within the industrial estate.
- Air quality is currently a concern, and there is no appropriate provision for the management of dust or asbestos as a result of the proposed expansion presenting a risk to local workers and the environment;
- The proposed expansion will significantly increase traffic volume in Pembury Road and the local infrastructure is not adequate to safely manage the additional traffic and type of vehicle. Bingo's application assessments do not properly recognise the issues caused by the proposed expansion and have not nominated effective measures to manage those issues.

The seven-fold expansion of the Bingo operations will significantly impact on Origin's business, the safety of all persons who enter the area and drive along Pembury Road and the environment. The Bingo application material does not adequately identify the impacts of the expansion and fails to address the impacts of such a large expansion. It is Origin's view that approval should not be granted to allow an expansion of the Bingo Resource Recovery Centre.