Mr Brent Lawson
The Trustee for MINTO PROPERTY TRUST
PO Box 7108
Silverwater New South Wales 2128

03/11/2021

Dear Mr Lawson

Minto Resource Recovery Facility (SSD-5339)
Request for additional information

I refer to Response to Submissions for the Minto Resource Recovery Facility (SSD-5339). The Department has reviewed the information and notes that there are still matters to be addressed.

The Department requires additional information that effectively addresses the issues in Attachment 1 as well as in other agencies comments which can be found here:

https://www.planningportal.nsw.gov.au/major-projects/project/10526

The Department's comments on the Air Quality Impact Assessment, along with comments from Council and the Environment Protection Authority, will be provided when they are finalised.

Please provide the information, or notify us that the information will not be provided, by 24 November 2021. If you cannot meet this deadline, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Emma Barnet, on 92746412/ at emma.barnet@planning.nsw.gov.au.

Yours sincerely,

William Hodgkinson
Team Leader
Industry Assessments

Attachment 1 – Department's comments

Plans

- Please label the individual stockpiles on one of the plans (PS02-A401 or PS02-A400), including the stockpiles of materials from the sand washing and concrete crushing plant. The label should describe the waste or product they hold.

General

- Please clearly describe what changes have been made as a result of submissions received during the exhibition of the Environmental Impact Statement. For example, the new stormwater layout, amended cut and fill, additional length of noise wall.
- A response must be provided to all issues raised in submissions. Outstanding issues that have not been sufficiently responded to include concerns regarding turbidity monitoring, property prices and effect on business, the blind spot on Montore Road, asbestos (which has been responded to by referring to the Asbestos Management Plan which relates to remediation, not the ongoing operations which were the concern). Please be specific in addressing the relevant issues.
- The RTS states that asphalt, road base, rock and terracotta are usually kept separate, but it still does not state where these products would be kept. The layout plan doesn't show stockpiles of these materials, instead the RTS refers to the main stockpiles which within which material is not separated. Describe where these materials are kept and the expected stockpile height and volume and show the location of these products on a plan.
- The RTS states that stockpiles adjacent to the boundary of the site will be 6 m but the stockpile layout plan, Drawing No. PS02-A401, states stockpiles C and D will be 8 m, please clarify.

Waste Management

- Please state whether all individual waste loads would be accompanied by a statement of compliance.
- It is noted that the RTS states that the site does not require a dedicated tip and spread area or stockpile separation as the waste would be source separated. However, unless each load of waste has a statement of compliance, standards 1.2 and 4.1 of the EPA's Standards for Managing Construction Waste in NSW still apply. Please address these standards noting that if it is anticipated the waste won't have a statement of compliance, dedicated tip and spread inspection areas are required for each tipping point and these areas must not overlap or touch other stockpiles. Address and show the tip and spread areas on a plan.
- The RTS still states that stockpile separation distances are not a requirement in the facility and stockpiles would touch each other. As previously identified, stockpile separation is required unless the stockpiles are the same listed waste type or are within an enclosed bay. Explain why stockpile separation is not required at the facility.

- Drawing No. 021-276-03B shows the AV vehicles unloading straight into the stockpile, not unloading areas, please update the plan to show the vehicles unloading into the dedicated unloading areas. The drawing also shows two trucks unloading at once, demonstrate the two tip and spread areas will be kept separate.
- Please address Council's concerns around worker's abilities to inspect every load imported, describe how the incoming trucks would be inspected and where the inspection point would be.
- Describe how waste would be moved around the site.
- The stated unloading and loading times do not seem to be realistic noting that the queueing and traffic assessments must assess worst-case. Please propose a more realistic timeframe and re assess the stacking of heavy vehicles.
- According to the Noise Impact Assessment, the development would only have one front end loader loading vehicles and moving tipped material, yet the queuing plan shows three trucks loading at once and 6 unloading. Please provide more realistic unloading numbers and timings based on the operation of 1 front end loader.

<u>Noise</u>

- It is still unclear whether the hydraulic rock breaker and pulverisor would operate in or out of the shed and whether this has been taken into account in the noise (and air) assessments. It is also unclear if the rock breaker and pulverisor would be used simultaneously. Please clarify.
- Please estimate how often the hydraulic rock breaker would be used over the course of the worst hour noting it doesn't have the same sound power level as a pulverisor. The NIA must be updated to include its use given the NPI requires consideration of worst-case scenario.
- Please model the impact of extending the noise wall along the western boundary.

<u>Water</u>

- The Soil and Water Management Plan states that no discharge to Bow Bowing Creek is expected but the RTS still states that in large events water will discharge to Bow Bowing Creek. Please clarify and quantify the volume and frequency of water that will discharge to Bow Bowing Creek.
- The statement 'no untreated stormwater will be directly discharging to Bow Bowing Creek. Therefore, the proposed development will not alter the flow behaviour and impact adversely on the creek' does not make sense given treated water discharged to the creek still has the capacity to alter flow behaviour. In addition, the RTS states that in large rain events water will overtop and discharge to the creek, it is assumed this water will be untreated. Please clarify.
- Confirm whether the sampling carried out at the Applicant's Wetherill Park facility, to inform the site's water characterisation, was undertaken soon after leachate-inducing events such as rain.
- Confirm whether the sampling points at the Wetherill Park facility are nodes draining leachate areas only or draining both stockpiles and additional clean catchments.

Traffic

- The swept path diagrams indicate that a truck cannot exit the site if a truck is entering and vice versa, please describe how these movements would be managed onsite. A sign only is not sufficient.
- Given space constraints in the tip and spread and manoeuvring area, it is necessary to identify swept out manoeuvres for AV design vehicles on the plan. It is again asked that a site plan be provided which shows swept paths as set out in AS 2890.2-2018, stockpile locations, tip and spread areas and loading areas (including appropriate areas for design loader vehicle manoeuvring areas adjacent to the truck), and swept out locus of the design truck(s) (including of all unloading vehicles) and trailer(s) between the site entrance, accessing all unloading and loading points, and site exit, on the plan.
- Explain why the swept paths, particularly those shown entering and exiting the site, in Attachment 9 are different to those in Drawing 2021-276-03B in appendix 12 and which one is accurate.
- Based on truck arrivals at the specified short interval, identify how many separate and concurrently operating tip and spread areas are necessary to avoid internal queueing.
- The Fire Engine swept path shown in Drawing No. 2021-276-04B runs over the unloading area adjacent to the sand stockpile, please amend.

Leachate and Groundwater Impact

- The development includes construction of a crushed concrete hardstand, please demonstrate that the hardstand would be impermeable and if not, describe flowrate and impact of ongoing leachate seepage on in-situ soils.
- Please provide details of any proposed impervious layers, such as impervious liners or pavement binder layers.