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Mr Shivesh Singh
Bingo Recycling Pty Ltd
PO Box 7,
Enfield NSW 2136

SSD 7462

Dear Mr Singh

Bingo Resource Recovery Facility, 13 Pembury Road, Minto (SSD 7462)
Request for Response to Submissions

The exhibition of the Environmental Impact Statement (EIS) for the proposed Minto Resource Recovery Facility ended on Monday 14 August 2017. All submissions received by the Department during the exhibition of the proposal are now available on the Department's website at:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7462

In accordance with section 85A of the *Environmental Planning and Assessment Regulation 2000,* the Secretary requires Bingo Recycling Pty Ltd (the Applicant) to provide a response to the submissions made during the exhibition period. You must also provide additional information in response to the Department's comments provided at **Attachment 1**.

However, it should be noted that the Environmental Protection Authority (EPA) submission indicates the EIS has not identified or addressed the EPA minimum standards for managing construction and demolition waste in NSW. As such, the EPA is not willing to consider the application in its current form.

The Department requests your attendance at a meeting given the issues raised by the EPA prior to the preparation of a Response to Submissions report (RTS). Please contact Chloe Dunlop on the details above to arrange the meeting.

If there are any changes to the scope of the development that substantially change the environmental impacts of the development as outlined in the EIS, exhibition of the proposed changes may be required.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Chloe Dunlop, Senior Planning Officer, on the details above.

Yours sincerely

22/08/17.

Kelly McNicol
A/Director
Industry Assessments
as delegate for the Secretary

ATTACHMENT 1 – DEPARTMENT OF PLANNING AND ENVIRONMENT ISSUES

General

1. The Department is concerned the site will be unable to process the requested amount of waste per annum due to size and other site constraints. The EIS provides an assessment of the 'do nothing' option with the site continuing to operate with no increase to capacity. Provide an assessment of additional alternatives considered, including an assessment of proposed reduced annual production rates at the facility.
2. Demonstrate the proposal meets the NSW EPA *Minimum Standards for Managing Construction and Demolition Waste in NSW (October 2016)*, particularly the comments below.

Process and Operations

3. Section 4.2.8 of the EIS lists the existing and proposed plant, equipment and machinery used on site. Clarify what plant, equipment and machinery is existing and what is proposed and provide the specifications of the new plant.
4. Confirm the hours of operation of the proposed processing plant.
5. Provide further details of the method of loading and removal of outgoing material. This is to include a description of the:
    a. location of trucks used for loading; and
    b. frequency and method of loading.
6. The flow diagram in Figure 8 of the EIS indicates that a conveyor will be used to transfer brick and concrete, as well as soil from Shed B to Shed A. However, section 4.2.3 of the EIS states that only soil will be transferred to Shed A using the enclosed conveyor. Revise Figure 8 and clarify how each waste stream will be transferred from Shed B to Shed A and the timing of these transfers.
7. Confirm the location of any waste bins to be stored on site (including the location of the storage of containers with non-conforming waste) and demonstrate that the site has capacity to accommodate the storage of these bins.

Waste Streams and Stockpiles

8. Provide details of the expected duration that each waste stream will be stored on site.
9. Provide details of the expected quantities of material that will be recycled and sent to landfill per annum for each waste stream.
10. Provide further details of the methods for asbestos prevention, identification, separation and appropriate disposal.
11. Provide further details regarding public deliveries of waste to the site, including the following:
    a. proposed contractual arrangements with third party operators;
    b. details of the expected waste volumes to be transported; and
    c. details of the expected number and vehicle types.

Plans

12. The Department is concerned that the size of the designated stockpile areas is too small to cater for the processing volumes proposed. Provide detailed plans of:
    a. Shed A: showing the maximum dimensions of waste stockpiles based on the site having a maximum capacity of 10,000 tonnes of stockpiled waste as identified in the EIS; and
    b. Shed B: showing how unsorted waste is stockpiled and dimensions of stockpiles.
13. Provide floor plans and elevation plans for all existing structures on site.
14. Provide a proposed elevation plan from Pembury Road (southern) which shows all fencing to be located on the property boundary.

15. Provide an A3 scaled plan of Shed C which clearly shows the proposed processing plant.

Traffic

Traffic modelling:

16. Provide a breakdown of the proportion of light and heavy vehicles predicted to journey to and from the site during the proposed hours of operation.
17. Provide a detailed justification for the breakdown of types of vehicles accessing the site. What are the specific operational or waste stream changes which will result in the use of a greater number of heavy vehicles (which are more than 15 tonnes).
18. Provide a worst-case scenario for waste disposal and collection times per truck during peak periods.
19. The Transport Impact Assessment estimates the average waste disposal and collection time per truck will be 20 minutes. Please confirm that the total time required for waste disposal and collection activities accounts for trucks manoeuvring on the site.
20. Based on the proposed processing capacity, peak delivery times and the duration of time the truck is on-site, provide a worst-case scenario of vehicle stacking on site.
21. Provide further details regarding how public deliveries are co-ordinated and managed during peak times and in the event of an emergency plant shut down.
22. Provide further details regarding the proposed operational measures to manage traffic arriving at the site during an emergency plant shutdown or similar.

Vehicle manoeuvring:

23. Demonstrate how conflicts with existing traffic on Pembury Road and Airds Road will be avoided during peak waste delivery periods to ensure the safety and efficiency of the road network is maintained. This should include a draft Traffic Management Plan.
24. Provide plans showing the swept paths of the front-end loader proposed to be used to move waste on-site and vehicles used for waste collection. The plans should include the stacking of vehicles within the site to demonstrate there is sufficient space onsite at peak periods.
25. Demonstrate how conflicts with the largest vehicles entering the site and vehicles exiting the site will be managed.
26. The Transport Impact Assessment states that two (2) spaces for articulated trucks (19 metre (m) trucks) are available for stacking. However, the Swept Path for articulated trucks shows that only one 19 m truck could be stacked. Please provide clarification.
27. Section 6.7.4.3 of the EIS states that the largest vehicle required to access the site will be a 25 metre B-double truck. The EIS advises that large vehicle movements can be undertaken without crossing the road centre line. However, the swept path analysis for 25 m B-double trucks show vehicles will use most of the road width of Pembury Road to access the site. Please clarify this discrepancy.
28. Detail measures to be used to avoid traffic conflicts in the event the enclosed conveyor fails or breaks down.

Parking:

29. Parking along Airds Road by site vehicles associated with the proposal will not be permitted due to the potential impact on road safety and nearby intersections and impact on surrounding businesses. Provide details of alternative solutions.
30. Confirm that Pembury Road will not be used for the parking of site vehicles during site operation.
31. Provide further justification for the reduced provision of car parking on site.
32. Demonstrate compliance can be achieved with the Building Code of Australia and *Australian Standard AS2890 – Parking Facilities* requirements in relation to the provision of accessible car parking.

Air Quality

33. Provide an assessment of the dust emissions generated by off-site vehicle movements associated with the proposal, including cumulative impacts.
34. Sufficient discussion should be provided regarding the risk of asbestos dust emissions to air.
35. No monitoring of existing operations is provided to show air quality effects of existing operations. This should be provided in order to test the accuracy of modelling assumptions.
36. Discussion of the effectiveness of dust mitigation measures is required, in particular the use of a street sweeper.

Noise

37. The operational noise assessment is based on waste processing operating at 2,000 tonnes per day as well as up to 9 trucks idling on site and 8 trucks arriving and leaving during any 15-minute period. Please provide a revised operational noise assessment which accounts for a worst-case scenario should waste disposal and collection times be extended during peak periods.
38. Provide a detailed assessment of the development against the NSW EPA *Road Noise Policy* which includes an assessment of traffic noise on all surrounding roads.
39. Provide an assessment of the off-site traffic noise emissions from heavy vehicles (with a gross weight greater than 60 tonnes) which are proposed to use Pembroke Road.

Water

40. Provide further information on the management and disposal of leachate.
41. Provide further details of the existing and proposed water quality devices to ensure they are sufficient to maintain water quality, especially with the increase in size of stockpiles and tracked material on site.
42. Demonstrate the proposed stormwater collection and disposal system will have sufficient capacity to accommodate increases in peak flow rates and runoff volumes from the proposal and manage firewater.
43. Provide details of measures used on site to recycle water for operations.

Site Development History

44. Provide a copy of the stamped approved plans for Development Consent No. 1/DA2002.

Existing Infrastructure

45. The Department's review of aerial imagery of the site shows that the enclosed conveyor included in the proposal was recently constructed. Please provide evidence the enclosed conveyor has development consent.

Visual

46. Revise the substation location to provide a setback from the front boundary and provide additional landscaping along the Pembury Road frontage to screen the substation.

Contamination

47. Provide justification as to why no intrusive investigations or soil tests were undertaken as part of the Phase 1 Contaminated Land Investigation.

Owners Consent

48. Provide owner's consent for the lodgement of the SSD application in a separate letter. The owner's consent letter must be on company letterhead, reference the

Australian Business Number of the owner, the address of the site and be signed by two directors or a company secretary and a director.