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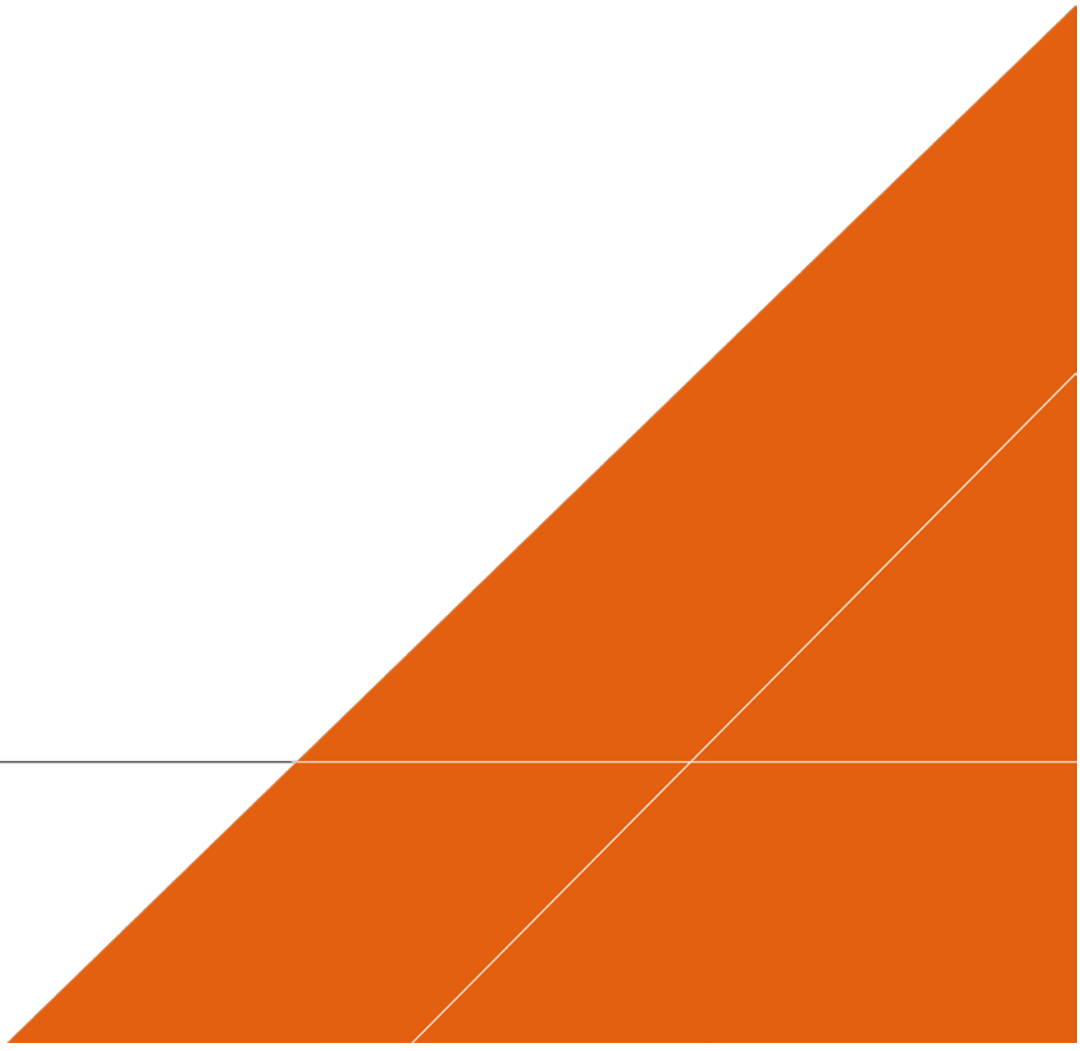
MINTO RESOURCE RECOVERY FACILITY

Response to Submissions – SSD 7462

15 MARCH 2018



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SKYLIFE PROPERTIES
MINTO RESOURCE RECOVERY FACILITY

Response to Submissions Report

SSD 7462

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REVISIONS

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01	14/12/2017	Response to Submissions for Adequacy Review	CH,SF, LC	BS
02	15/03/2018	Response to additional submissions	SF, CH, LC	BS

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APPENDICES

GLOSSARY AND KEY TERMS

The table below provides a summary of the key acronyms and terms which are included within this report.

Acronym / term	Meaning
AQIA	Air Quality Impact Assessment
BCA	Building Code of Australia
Council	Campbelltown City Council
CEMP	Construction Environmental Management Plan
C&D	Construction and Demolition
C&I	Commercial and Industrial
dBA	decibels
DP&E	NSW Department of Planning and Environment
DPI	Department of Primary Industries
EH&S	Environment, Health and Safety
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EPBC	*Environment Protection and Biodiversity Conservation Act 1999*
EPL	Environmental Protection Licence
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulations	*Environmental Planning and Assessment Regulations 2000*
IAQM	Institute of Air Quality Management
km	kilometre
L	litres
m^2	Metres squared
NCC	National Construction Code
NMP	Noise Management Plan

Acronym / term	Meaning
NSW	New South Wales
NVIA	Noise and Vibration Impact Assessment
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
PM	Particulate Matter
RNP	EPA Road Noise Policy
RRF	Resource Recovery Facility
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
State and Regional Development SEPP	*State Environmental Planning Policy (State and Regional Development*
TIA	Traffic Impact Assessment
TMP	Traffic Management Plan
TN	Total Nitrogen
TP	Total Phosphorous
tpa	tonnes per annum
TSC Act	*Threatened Species Conservation Act 1995*
TSS	Total Suspended Solids
VENM	Virgin Excavated Natural Material

1 INTRODUCTION

Bingo Recycling Pty Ltd (the Applicant) is seeking approval for an increase in processing capacity at the Minto Resource Recovery Facility, located at 13 Pembury Road, Minto (the Site). The Proposal would increase the amount of solid non-putrescible waste from up to 30,000 tonnes per annum (tpa) to up to 220,000 tpa of solid non-putrescible waste.

An Environmental Impact Statement (EIS) was prepared for the Proposal by APP Corporation Pty Limited in May 2017. That EIS sought approval under Part 4, Division 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). In particular, the EIS was prepared to address, and be consistent with, the Secretary's Environmental Assessment Requirements (SEARs) (SSD 7462) for the Proposal, which was issued on 28 January 2016.

The EIS was publicly exhibited, in accordance with Clause 83 of the *Environmental Planning and Assessment Regulations 2000* (EP&A Regulations) between 29 June 2017 and 14 August 2017. During this exhibition period submissions were invited from all stakeholders, including members of the community and government agencies. The submissions received included:

- A total of seven submissions from government agencies
- A total of 11 submissions from public stakeholders, including nearby businesses and members of the community.

The submissions received during and following public exhibition of the EIS form the subject of this report, known as a Response to Submissions (RtS), and are discussed and addressed within. Amendments are now proposed to the Proposal based on submissions provided by government agencies and the community, as part of design progression, and to provide additional clarity where relevant (Section 6).

1.1 Amended Proposal overview

As noted above, a number of changes have been made to the Proposal in response to submission made during the exhibition of the EIS. The key components of the Amended Proposal, incorporating these changes, would include:

- Construction of a shed and roof structure to enclose the existing waste processing and handling area
- Demolition of minor wall and cladding extents within Shed A and Shed C to accommodate the proposed shed extension, to facilitate changes to internal heavy vehicle flow paths
- Minor vegetation and landscape clearing, and planting of new landscaping
- Provision of 16 on-site car parking spaces and 1 accessible car space
- Relocation of demountable site office and amenities buildings
- Provision of two vehicle access points at the eastern entrance and a single exit point at the western exit.
- Removal of the existing above-ground wheel wash
- Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point
- Relocation of the 30,000 L self-bunded fuel tank closer to the rear of Shed A
- Extension of the dust suppression and sprinkler system across the new shed and its openings

- Provision of ancillary infrastructure and internal structures including new internal push walls
- Demarcation of an internal unloading floor and visual inspection area
- Extension of internal tipping floor and provision of new push walls
- Provision of an internal dangerous goods storage area.

The key operational components of the Amended Proposal, which are consistent with those proposed within the EIS, would include:

- Increasing operational (including processing and waste delivery and collection) hours 6am to 10pm, Monday to Saturday (no works on Sundays or public holidays would be undertaken)
- Processing of up to 220,000 tpa of non-putrescible waste
- Waste storage of up to 10,000 tonnes of non-putrescible waste at any given time.

In addition to the Amended Proposal components outlined above, this application is also seeking approval for the existing conveyer and processing machinery on the Proposal site. Whilst these components are not explicitly included within the Proposal (as they are existing) it is considered that the potential impacts arising from their operation has been assessed within the EIS, RtS and supporting specialist studies.

1.2 Purpose of this report

The purpose of this RtS is to respond to submissions raised by stakeholders during and following the exhibition of the EIS. This RtS has been prepared to satisfy the provisions of Section 89G of the EP&A Act and Clause 85A of the EP&A Regulations. Each of the submissions received has been collated, analysed and addressed (as relevant).

In order to respond to the issues raised, this RtS also includes amendments to the exhibited Proposal, now known as the Amended Proposal. These amendments have been undertaken to address submissions received and to reduce the overall environmental impacts of the Proposal. The RtS provides a description of the Amended Proposal and includes the further environmental assessment, including commissioned technical assessments, of the Amended Proposal undertaken to serve as an addendum to the environmental impact assessment and technical specialist reporting provided within the EIS.

Amendments made to the Proposal are described in Section 6. In addition, a consolidated Amended Proposal description is provided in Appendix A which describes the Amended Proposal in its entirety, including the proposed amendments. The consolidated Amended Proposal description includes unchanged parts of the Proposal which have been amended in description only to provide clarification and improve the structure of the Amended Proposal description. It is noted that these amendments do not reflect a change to the project description itself, but only serve to clarify what was previously provided.

1.3 Statutory approval process

Clause 23(3) of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development)* (State and Regional Development SEPP) states that:

Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste is classified as State Significant Development (SSD). As the Proposal would process up to 220,000 tpa of waste, the Proposal is to be assessed as SSD and approval is sought under Part 4, Division 4.1 of the EP&A Act.

1.4 Structure of this report

The structure of this RtS is as follows:

- Section 1 – Introduction: provides an introduction to and overview of the Proposal, the relevant statutory approval pathway and the structure of the RtS
- Section 2 – Exhibition and Consultation: provides a description of the consultation which was undertaken as part of the EIS and following exhibition of the EIS
- Section 3 – Overview of Submissions: provides an analysis of the submissions received during the exhibition of the EIS and identifies the key issues raised
- Section 4 – Response to Government Agency Submissions: provides a catalogue of responses received from Government Agencies and responses prepared by technical specialists
- Section 5 – Response to Community Submissions: provides a summary of the community responses received and responses to each of these prepared by technical specialists
- Section 6 – Amended Proposal: provides a description of the amendments to the Proposal design, including any modifications to the built form and operational procedures presented in the EIS
- Section 7 – Further assessment: provides an environmental assessment of the Amended Proposal components with reference to technical specialist addendums, and provides additional environmental assessment raised in government agency and community submissions
- Section 8 – Revised Compilation of Mitigation Measures: provides a revised list of mitigation measures to include any changes as a result of submissions received, updated technical assessments or the Amended Proposal
- Section 9 – Conclusion: provides a summary and conclusion to the RtS.

The following Appendices are included in this RtS:

- Appendix A – Consolidated Project Description
- Appendix B – Architectural drawings
- Appendix C – Landscape plans
- Appendix D – Stormwater and dust suppression plans
- Appendix E – Capital Investment Value estimate
- Appendix F – Bingo Systems and Procedures for Managing Non-Conforming Waste
- Appendix G – Addendum Noise and Vibration Impact Assessment
- Appendix H – Addendum Air Quality Impact Assessment
- Appendix I – Addendum Traffic Impact Assessment
- Appendix J – Biodiversity Assessment Memorandum
- Appendix K – Fire Engineering Concept Design Statement

2 EXHIBITION AND CONSULTATION

The EIS was placed on public exhibition between 29 June 2017 and 14 August 2017 in accordance with Section 89F (a)(a) of the EP&A Act. Hard copies of the EIS were available for public review and comment at various locations (including the following) for the duration of the exhibition period:

- Department of Planning and Environment: 320 Pitt Street, Sydney
- Campbelltown City Council: Corner Queen and Broughton Streets, Campbelltown

The EIS was also available to the public in electronic format on the DPE website during this time.

2.1 EIS consultation

The Applicant undertook ongoing consultation with government agencies throughout the preparation of the EIS, including:

- Campbelltown City Council
- The Department of Planning and Environment
- NSW Environment Protection Authority
- Roads and Maritime Services.

This consultation was undertaken through a range of mediums, including emails, phone conversations, face-to-face meetings and letter submissions.

Feedback from the agencies consulted informed the preparation of the EIS and the project description as it was then understood.

Key stakeholders and community members were also consulted during the preparation of the EIS by written notification and through the Applicant's website, which provided the key details of the Proposal.

2.2 Post Public Exhibition Consultation

A number of meetings have been undertaken with government agencies subsequent to the exhibition of the EIS. The purpose of these meetings has been to discuss the submissions received, and gain a greater understanding of any key issues, with a view to resolving these where possible.

The following government agencies were consulted with following the exhibition of the EIS, and during the preparation of this RtS:

- NSW Department of Planning and Environment (DP&E)
- NSW Environment Protection Authority (EPA)
- Campbelltown City Council (Council)

The abovementioned government agencies were consulted with through meetings, telephone conversations, email and/or letter correspondence.

The Applicant met with DP&E and the EPA on 30 August 2017 to discuss the key issues raised during the EIS exhibition period. A summary of the outcomes of this meeting is provided in Table 2-1.

Table 2-1 Outcomes from August 2017 meeting with NSW DP&E and NSW EPA

Comment	Clarification/outcome
Additional information should be provided regarding the Proposal site's ability to process the proposed throughput	An Amended Proposal description has been prepared to outline the proposed changes to the Proposal that have been made in response to comment raised during the EIS exhibition period, as well as to provide additional clarity and detail regarding the proposed operations. Section 1.4.9 of the Amended Proposal description (provided in Appendix A) provides additional information regarding the Proposal site's ability to process the proposed throughput.
During inspections limited quality controls have been observed for waste inspection	The Amended Proposal would include an additional demarcated area for visual inspection of waste. The total area available for tipping and inspecting of waste would therefore be increased from 630 m^2 to 1,120 m^2. Loads would initially be inspected as vehicles enter the Proposal site from the viewing platform adjacent to the two inbound weighbridges. The load would then be inspected again on the tipping floor during and after unloading to determine waste acceptability, and any non-conforming waste would be removed from the Proposal site. All non-conforming waste would be managed in accordance with the *Bingo System and procedures for managing non-conforming waste* (provided in Appendix F).
The EPA has concerns about Bingo's approach to statutory compliance The facility is understood to be at or close to the proposed throughput limit of 220,000 tpa	Minto Recycling Pty Ltd (a related entity of the Applicant), has undertaken ongoing consultation with the EPA, particularly in respect of throughput exceedances in the last annual reporting period for the EPL. Factors contributing to the increase in throughput received at the facility have been discussed with the EPA. Consequences of the Minto RRF not receiving waste volumes at the current, and future proposed, throughputs would include impacts to industry resource recovery rates (and more waste being sent to landfill), failure to reuse recoverable C&D waste, exacerbation in the shortfall of the C&D waste management capacity across Sydney, increase in transport of waste and loss of employment. The consequences would have detrimental social, environmental and economic impacts. The Amended Proposal seeks to increase the proposed throughput to 220,000 tpa, in line with market needs and the EPA's priorities and objectives to improve operational practices within the C&D recycling industry. Addendum technical assessments have been undertaken to support the preparation of this RtS. These assessments have considered the change in operations since the EIS was originally prepared, including an assessment based on the current activities and throughput.
Key concerns around environmental issues	The EIS, exhibited in June 2017, did not identify any significant environmental impacts associated with the Proposal. Notwithstanding this, a number of design refinements have subsequently been made to further improve the environmental performance of the Minto RRF. The findings of the addendum technical assessments are presented in Section 7. The Amended Proposal with the EPA objectives to improve operational practices within the C&D recycling industry and is in line with the EPA *Consultation paper - New minimum standards for managing construction and demolition waste in NSW*.
The community perspective is that the	In response to submissions received during the exhibition period a number of design changes have been made to the Proposal to

Comment	Clarification/outcome
key issue at the facility is dust	optimise operational efficiency and minimise potential environmental impacts. These measures include the installation of an additional wheel wash at the exit of the Proposal site, full enclosure of the operational area of the Proposal site, and extension of the dust suppression system. The combination of the additional proposed dust mitigation measures would appropriately manage potential dust impacts from the Proposal (see Section 7).
It is recommended that the Applicant hold a meeting with Campbelltown City Council	The Applicant held a meeting with Campbelltown City Council on 6 October 2017. The outcomes of the meeting are summarised in Table 2-2.
The use of the street sweeper should be contingency measure not routine management	As noted above, in response to submissions received during the exhibition period a number of design changes have been made to the Proposal. These measures include the installation of an additional wheel wash at the exit of the Proposal site, full enclosure of the operational area of the Proposal site, and extension of the dust suppression system. The combination of the additional proposed dust mitigation measures would appropriately manage potential dust impacts from the Proposal (see Section 7).

A meeting was held between the Applicant and Campbelltown City Council (Council) on 6th October 2017 to discuss key issued raised by Council during the EIS exhibition period and for the Applicant to provide Council with an overview of the proposed design changes made as part of the Amended Proposal. Table 2-2 provides a summary of the outcomes of this meeting.

Table 2-2 Outcomes from October 2017 meeting with Campbelltown City Council

Comment	Clarification/outcome
The key issues associated with the Proposal are dust and traffic.	An Addendum Air Quality Impact assessment (Appendix H), Addendum Traffic Impact Assessment (Appendix I) and Draft Operational Traffic Management Plan (Appendix I) have been prepared to assess the Amended Proposal and provide additional clarification regarding the potential air quality and traffic impacts associated with the Amended Proposal. In response to submissions received during the exhibition period a number of design changes have been made to the Proposal to optimise operational efficiency and minimise potential environmental impacts. These measures include the installation of an additional wheel wash at the exit of the Proposal site, full enclosure of the operational area of the Proposal site, and extension of the dust suppression system. The combination of the additional proposed dust mitigation measures would appropriately manage potential dust impacts from the Proposal (see Section 7). Proposed design changes would also optimise internal traffic flows within the Proposal site. The Addendum Traffic Impact Assessment found that compared to current conditions, the Amended Proposal would result in an additional eight two-way vehicle movements (4 vehicles) during the morning road network period and five two-way vehicle movements (3 vehicles) during the afternoon road network period. The impacts on the surrounding network are therefore considered

Comment	Clarification/outcome
	to be minor. Further, a Draft Operational Traffic Management Plan (Appendix I) has been prepared to optimise the efficiency and safety traffic movements, both onside and within the surrounding road network.
Swept path plans with largest vehicles to be entering site to be submitted to Council	An Addendum Traffic Impact Assessment has been prepared to assess the proposed changes associated with the Amended Proposal. The layout of the Proposal site has been optimised to enhance safety of heavy vehicles within the Proposal site. An assessment, including diagrams, of swept paths is provided in the Addendum Traffic Impact Assessment (Appendix I)
Fire safety/ BCA consult to check fire rating and compliance of the proposed wall at the eastern boundary as there is no setback	An assessment of the Amended Proposal against the National Construction Code (NCC) – Building Code of Australia was included as Appendix N of the EIS (Fire safety study). Appendix K of this RtS provides a Fire Engineering Concept Design Statement incorporating the requirements of the BCA and providing recommendations for compliance during the detailed design phase has been prepared and is included as Appendix K of this RtS.
Clarification on wheel wash and where it drains to requested by Council	The proposed new wheel wash would be a self-contained reticulating system that would not discharge water. When required water would be pumped for disposal. An amended stormwater plan (Appendix D) has been prepared to identify the proposed amendment to the stormwater infrastructure and design as a result of the proposed design amendments.
Clarification on EH&S matters, particularly welfare of staff working inside building – what PPE and measures will be taken to protect their wellbeing from dust impacts	The majority of personnel working at the Proposal site at any given time work within the picking station which comprises a sealed, air-conditioned unit which provided protection to personnel from dust related impacts. Further, the management of health and safety during operation of the facility will be undertaken in accordance with the Operational Environmental Management Plan and Safety, Environment and Quality management systems; prepared in accordance with *AS 3745 - 2010 Planning for emergencies in facilities.* Eye protection and dust masks will be worn where required, as outlined in these management systems.
Clarification required on full lifecycle of waste i.e. how do we deal with incoming and outgoing waste outside of operating hours. Pre-loading deals with outgoing waste however Council would like to understand how incoming waste is managed from various infrastructure projects that operate outside of typical working hours.	An Amended Proposal description has been prepared to outline the proposed changes to the Proposal that have been made in response to comment raised during the EIS exhibition period, as well as to provide additional clarity and detail regarding the proposed operations. Section 1.4.9 of the Amended Proposal description (provided in Appendix A) provides additional information regarding the full lifecycle of waste and how it will be processed at the facility.
EPLs of facilities receiving processed waste to be updated in RTS	As noted above an Amended Proposal description has been prepared (Appendix A). Section 1.4.3 of the Amended Proposal description provides updated information on tipping facilities and their EPLs.

2.3 Next steps

The Applicant continues to maintain a dedicated email address and information phone line for the Proposal, which were established during the preparation of the EIS. These would remain available for use by the community during the construction phase of the Amended Proposal.

3 OVERVIEW OF SUBMISSIONS

A number of government agency and public submissions have been received during the recent exhibition of the EIS (between 29 June 2017 and 14 August 2017). Following submission of the RtS for adequacy in December 2017, additional clarifications were received from several stakeholders. These issues have been integrated into those previously received to form one consolidated RtS. An overview of the submissions and a summary of the process undertaken to ensure that the submissions have been appropriately responded to is provided below.

3.1 Submissions received

Submissions were received from a total of seven government agencies, including the following:

- Department of Planning and Environment (DP&E)
- Environment Protection Authority (EPA)
- NSW Fire and Rescue
- Roads and Maritime Services (Roads and Maritime)
- Sydney Water
- Campbelltown City Council.

It is noted that the submission from Roads and Maritime did not raise any objections or comments and is not further considered in this document.

A total of eleven submissions were received from members of the public and nearby business owners.

Clarifications received following submission of the RtS for adequacy review (all from previous submitters) have been incorporated into the previous submissions. These have not been counted as new or unique submissions in the numbers below.

3.2 Submission response methodology

3.2.1 Technical specialist input to submissions

Government agency and public submissions were provided to the Applicant's team of technical specialists. Based on the content of the submissions and the Amended Proposal description (described in Section 6), the technical specialists undertook additional technical assessments and, where relevant, provided responses to the issues raised.

The additional assessments undertaken are appended to this RtS and are summarised in Section 7. The information pertaining to relevant responses have been referenced and addressed in the response tables in Section 4 (Government Agency) and Section 5 (Public) of this RtS.

3.2.2 Government agencies

As outlined in Section 3.1, a total of seven government agencies provided submissions, five of which raised issues to be addressed. Each submission varied in terms of the number and type of items for consideration raised, with some agencies, depending on their function/responsibility, raising more issues than others. Each agency submission was reviewed and considered. Responses to each government agency submission have been provided in Section 4 of this RtS.

3.2.3 Public Submissions

As outlined in Section 3.1, a total of eleven submission were received from members of the public and nearby business owners. These submissions were summarised into key aspects, issues and sub-issues using a system of reference numbers. The process of identifying this detail was iterative, utilising three rounds of review to capture each level of detail – key aspects, issues and sub-issues. Each submission was analysed and responded to at an issue and aspect level.

Responses to the key issues raised in public submissions have been provided in Section 5 of this RtS. A summary of the key issues raised within public submission has been provided below.

Summary of public submissions received

The environmental aspects raised within public submissions, and the number of comments relating to each aspect are presented in Table 3-1 and Figure 3-1. Traffic and transport, and air quality were the most frequently raised aspects within the submissions received.

Table 3-1 Number of comments by aspect

Aspect	No. comments by aspect
Traffic and transport	74
Air quality	30
Water quality	4
Noise and vibration	4
Contamination	5
Hazard and risk	1
Socio-economic	12
Project development and alternatives	10

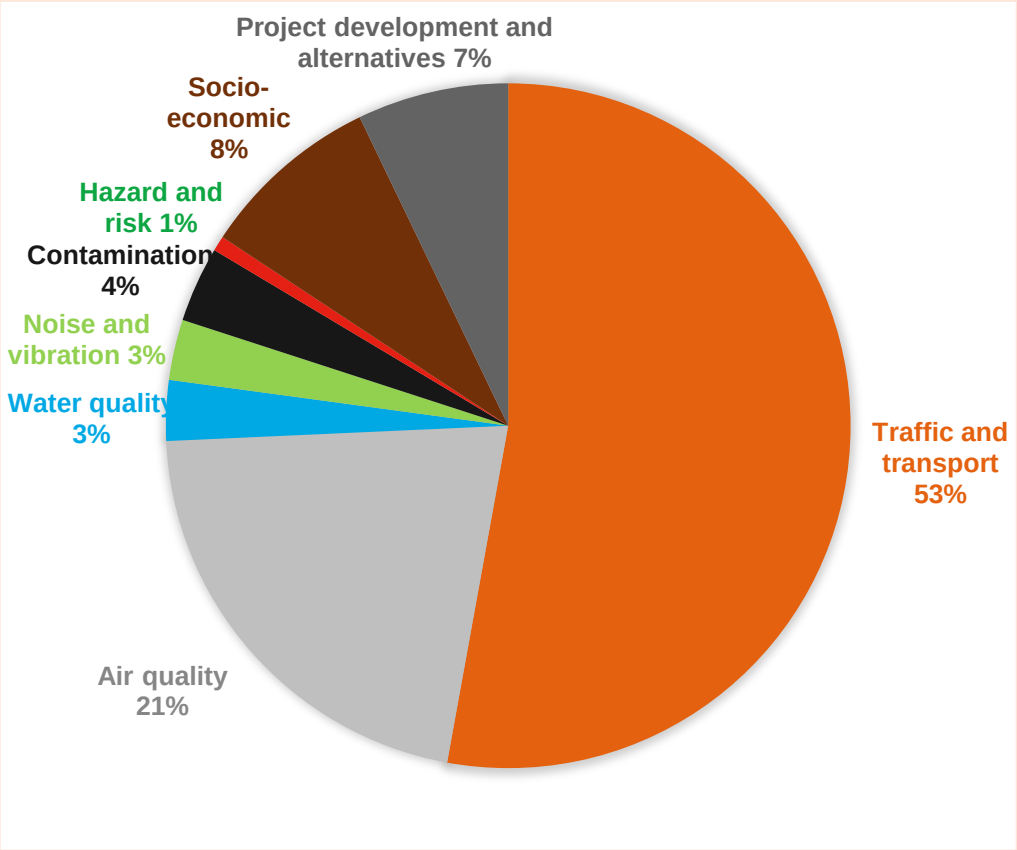


Figure 3-1 Percentage of comments by aspect

Table 3-2 presents a summary of the issues raised within each aspect and the number of submissions that raised each issue. Note that each submission may have raised multiple issues within each aspect.

Table 3-2 Summary of key community issues raised

Aspect	Issue	Number of submitters raising issue
Traffic and transport	Vehicle queuing off-site	8
	Vehicle stacking on-site	5
	Transport routes	1
	Increased traffic volume	9
	Parking on Pembury Road	6
	Safety of surrounding road networks	8
	Maximum number of trucks on-site	3
	Visibility	1
Air quality	Deposited dust	9

Aspect	Issue	Number of submitters raising issue
	Dust tracked by vehicles	8
	Health impacts	3
	Lack of monitoring data	1
	EPL compliance	1
Water quality	Sedimentation	3
	Canal pollution	1
Noise and vibration	Traffic noise	2
	On-site noise	2
Contamination	Asbestos	4
Hazard and risk	Waste fire risk	1
Socio-economic	Loss of business	6
	Real estate devaluation	3
Project development and alternatives	Interstate transportation of waste	1
	Suitability of location	4
	Type of buildings	1
	General objection	4

4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

The Local and State government authorities listed in Table 4-1 provided responses as part of the public exhibition of the EIS. A summary of the nature of the submissions received and any aspects raised is provided in the table below, as well as an outline of responses provided to aspects raised.

Table 4-1 Summary of nature of Agency submissions, aspects raised and response provided

Agency	Summary of aspects raised	Response
Environment Protection Authority (EPA)	The EPA raised the following aspects: • Waste management • Noise and air quality • Statutory compliance • Environmental issues • Proposed throughput	The aspects raised by EPA have been analysed and detailed responses have been provided in Section 4.1.
Fire and rescue NSW	NSW Fire and Rescue identified a number of recommendations for ensuring fire safety through suitable design of the Amended Proposal.	The recommendations made by Fire and Rescue have been analysed and detailed responses have been provided in Section 4.2.
Roads and Maritime Services (Roads and Maritime)	Roads and Maritime raised no objections or aspects for consideration.	No response required
Department of Primary Industries (DPI)	DPI did not raise an objection to the Proposal. DPI noted that should groundwater be encountered during construction then further information would need to be provided to, and authorisation granted by, DPI.	During construction, the existing site levels would be retained and any ground disturbance would be minimal and limited to excavation for footings only. It is unlikely that groundwater would be affected at the depths proposed for footings. There is negligible if any risk of coming into contact with groundwater. Notwithstanding should groundwater be encountered the Applicant will consult with DPI.
Campbelltown City Council (Council)	Council did not raise an objection to the Proposal. Council raised the following aspects for consideration: • Consultation • Traffic and transport • Air quality • Waste management	The aspects raised by Council have been analysed and detailed responses have been provided in Section 4.3.

Agency	Summary of aspects raised	Response
Sydney Water	Sydney Water did not raise an objection to the Proposal. Sydney Water provided the Applicant with information and recommendations for the Applicant's consideration.	The information provided by Sydney Water will be considered by the Applicant as relevant when determining servicing needs during detailed design, construction and commissioning of the Amended Proposal.

4.1 Environment Protection Authority

A formal submission comprising a letter (dated 24 July 2017) was received from the Environment Protection Authority (EPA). The formal letter received outlined that the EPA were unable to undertake a detailed assessment of the Proposal on the basis the EIS had not identified how the Proposal would address the draft minimum standards for managing construction and demolition waste in NSW. Subsequent to the exhibition period the Applicant met with the EPA (refer Section 2) to discuss the Proposal, the EIS and amendments to the Proposal proposed by the Applicant to address the draft minimum standards for managing construction and demolition waste in NSW. Following consultation between the Applicant and EPA, the EPA provided a letter (dated 30 August 2017) summarising their comments regarding the Proposal. The comments provided by the EPA within the formal submissions letter and the subsequent letter (although received outside of the exhibition period) were summarised and responded to in a consolidated RtS. Following review of the RtS the EPA provided additional responses requesting further clarification on several issues. These additional responses have been integrated into those previously received and have been addressed in Table 4-2.

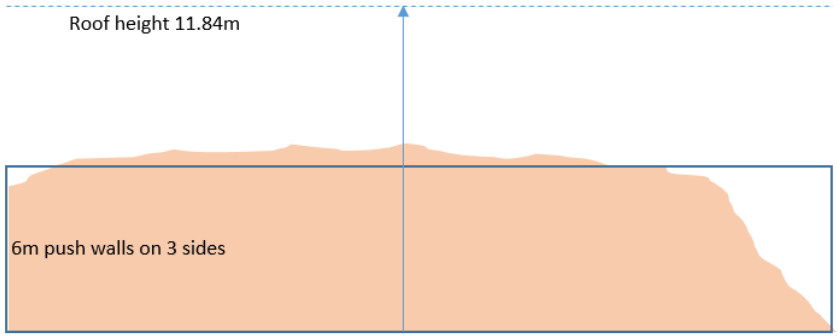
Table 4-2 Response to Government Agency submission – Environment Protection Authority

Submission text	Response / comment	Reference
Waste management		
The EPA is unable to undertake a detailed assessment of the Proposal and therefore cannot support the Proposal in its current form as the proponent, Minto Recycling Pty Ltd, has not identified or addressed the proposed minimum standards for managing construction and demolition waste in NSW. Whilst the proposed minimum standards are currently in draft form, the EPA has consulted with the waste industry, including the Bingo Industries Group of Companies, regarding the proposed minimum standards.	As noted in the submission, the EPA released the 'Standards for managing construction waste in NSW (draft for public consultation)' in 2017. The aim of the document is to detail a set of standards that a C&D waste facility must comply with for the purpose of meeting Part 8A of the Waste Regulation. The strategic objectives of the standards are to incentivise greater resource recovery and reduced interstate transport and to separate asbestos and other contaminants for disposal to an appropriately licenced landfill. The standards primarily consist of a number of operational requirements to be implemented at a site. Given that the Proposal is still in the pre-approval stage, updated operational documentation is yet to be finalised. The OEMP developed for the Amended Proposal will include the requirements as outlined within the enacted minimum standards. An overview of how the Amended Proposal would meet the draft standards has been provided below. **Standard 1** *1.1 Inspection point 1 – verified weighbridge inspection*	N/A

Submission text	Response / comment	Reference
	A raised inspection platform is provided adjacent to incoming weighbridges to allow for visual inspection of waste loads. *1.2 Inspection point 2 – tip and spread inspection area* The Amended Proposal (as described in Section 6) has increased the tipping floor to allow for the provision of a demarcated visual inspection area while having minimal impact on vehicle receival rates. Visual inspection in this area would be undertaken in accordance with Standard 1.2. *1.3 Training requirements for personnel* Training requirements as outlined within Standard 1.3 will be included within the OEMP developed for the Proposal. *1.4 Rejected loads register* The OEMP prepared / updated for the Amended Proposal will contain a rejected loads register. **Standard 2: Sorting requirements** *2.1 Sorting* Waste will be sorted in accordance with Standard 2.1. **Standard 3: No mixing of waste** *3.1 No mixing of inspected and sorted construction waste with waste that has not been inspected and sorted* Processed waste would be organised within waste streams and would be stored within individual bays. Sorted waste would not be mixed with non-sorted waste, in accordance with Standard 3.1. **4 Standard 4: Waste storage requirements** *4.1 Waste storage area* *4.1.1 Waste storage* Processed waste would be organised within waste streams and would be stored within individual bays in accordance with Standard 4.1.1 *4.1.2 Waste stored in unpermitted waste storage area*	

Submission text	Response / comment	Reference
	All unpermitted waste types moved to a waste storage area in accordance with the standards would be transported to a waste facility that can lawfully accept that waste within one business day of receipt at the C&D waste facility. *4.2 Inspection point 3 – waste storage area* *4.2.1 Obligations of trained personnel* Training requirements as outlined within Standard 4.2.1 will be included within the OEMP developed for the Proposal. *4.2.2 Inspection records* Inspection records will be maintained in accordance with Standard 4.2.2. **Standard 5: Transport requirements** *5.1 Transport requirements* C&D waste would not be transported from the Amended Proposal site unless it has been inspected, sorted and stored in accordance with the standards and the load of waste transported from the Amended Proposal site consists of a single waste type.	
That the Proponent had been identified as failing to ensure appropriate quality controls on incoming waste, a key concern of the EPA's considering that some of the waste is recovered and sold back into to the community (the EPA has taken punitive action for this)	As identified above, the OEMP for the Proposal will detail inspection requirements (as provided in *Standards for managing construction waste in NSW)* to manage the potential for receival of non-complying waste. Any non-conforming waste would be handled in accordance with Bingo's 'Systems and procedures for managing non-conforming waste' (Appendix F).	Appendix F of this RtS
The EPA's original submission on the exhibited EIS expressed concerns about the proponent's ability to properly inspect, sort and process waste streams on site under the proposed expansion. The submission stated that the EPA could not support the proposal in its current form as the proponent had not identified or addressed the proposed *Minimum Standards for Managing Construction and Demolition Waste in NSW*. The RTS document addresses the minimum standards by identifying procedures that would be implemented to address waste inspection, sorting and storage requirements, however the EPA remains concerned that the number of truck movements proposed, particularly during the peak period of 12pm – 1pm, will	Appendix I (Addendum Traffic Impact Assessment) of the RtS identifies that the operational peak period for the amended Proposal has been shifted from the previous peaks of 9am – 10am and 12pm – 1pm, to 6am – 7am. Previously where there were two peak periods there is currently only one peak period. Consolidation of the operational peak periods to a single hour can be more effectively managed by the Site Operator in terms of waste and traffic operations. The peak vehicle movements as identified in the RtS of 54 two-way vehicle movements (27 vehicles), represents a conservative calculation for peak hour movements on the peak day (i.e. the worst case scenario). As such, the majority of the time, vehicle movements would actually be fewer than this. Non-conforming waste would be handled in accordance with Bingo's 'Systems and procedures for managing non-conforming waste'. Inspection of incoming loads would occur in a number of stages to ensure non-conforming wastes are	Appendix I of the RtS

Submission text	Response / comment	Reference
not afford sufficient time to allow a genuine assessment of incoming waste loads. The RTS states that the amended proposal is expected to generate up to 54 two-way vehicle movements (27 vehicles) per hour during the peak period between 12pm and 1pm. This would suggest an average inspection time of only 2 minutes and 13 seconds per load. The EPA is concerned that this would not be sufficient time to carry out a genuine assessment of waste received and consequently any non-conforming wastes (e.g. asbestos) present in the incoming loads may not be identified. Given that the proponent anticipates that 85% of incoming wastes will be recovered and ultimately re-used in the community, this presents a risk of contaminated products entering the market place. If DPE decides to approve the application, it is recommended that any increases to waste limits be subject to a staged roll-out that is contingent on the operator demonstrating the effectiveness of its waste inspection processes and its ability to ensure non-conforming products do not enter the facility's processing line.	identified. At the inbound weighbridge, site personnel visually identify waste carried by the vehicle. The purpose of this inspection is to be a fast and non-intrusive check to confirm that the waste material generally matches the description provided by the driver. Site personnel conducting this inspection are situated on a platform above the weighbridge office which is elevated above the height of a truck stationed on the weighbridge itself. The waste material is inspected for any unauthorised waste, such as asbestos, on the surface of the load. Site personnel stationed at the tip floor undertake a more thorough visual inspection of the waste. Once site personnel have authorised the waste to be unloaded, they would continue to inspect the waste as it is placed onto the tip floor for any concealed or unauthorised waste. Waste that has been tipped onto the tipping floor would be spread to approximately 100 mm thick so that each load can be visually inspected. Site personnel would inspect the load for any contaminants and once cleared, the load would be pushed into the stockpile ready for processing. A dedicated, demarcated unloading floor and visual inspection area has been provided within the amended proposal site to facilitate this process. The 2 minutes 13 seconds suggested in the submission would represent an average inspection time during the conservatively estimated peak hour on the peak day, considered a 'worst case scenario'. In reality, the duration of waste inspection times would vary depending on the size and nature of the load. Small or simple loads could be inspected in significantly less than the average time while larger or complex loads may require longer. To accommodate this variability in inspection times, additional stacking spaces (increased from17 to 21) have been provided. It is noted that the 27 vehicles expected to arrive during this peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces, there would be 13 vacant stacking spaces remaining. This demonstrates that the Proposal has capacity to sufficiently accommodate fluctuations in the inspection times to ensure loads are thoroughly assessed to identify any non-conforming waste. As detailed above, inspection for non-conforming waste would occur in a number of stages. The Proposal would allow ample time to inspect waste and would effectively manage the identification of non-conforming waste within incoming waste streams. As such, the implementation of a staged roll out of waste limits is not required.	
The proponent is seeking to increase the maximum allowable quantity of waste to be held at the site at any one time to 10,000 tonnes. The EPA is of the view that the proponent has not adequately demonstrated that sufficient storage capacity exists at the premises to justify the proposed storage amount. Of	A review of the stockpile volumetric estimate provided in Table1-8 of Appendix A of the RtS has been undertaken in response to NSW EPA's commentary. Shed B, as amended with the RtS will have a total floor area of 1,120m^2, of which approximately 120m^2 is allocated as the Unloading Floor and Visual Inspection Area (refer to Figure 1-1 in Appendix A of the RtS). A further 150m^2 can be	Appendix A of the RtS

Submission text	Response / comment	Reference
particular concern is the proponent's claim that 4920 cubic metres of waste could be stored in Shed B. Assuming a storage area of 1120 m2, as stated in the RTS, this would equate to an average stockpile height of at least 4.39 metres (assuming a vertical stockpile) over the entire footprint of Shed B and would limit the floor area available in the shed for the tipping and inspection of incoming loads. If DPE decides to approve the application, it is recommended that the total amount of waste permitted to be stored on site at any one time remain at 7500 tonnes, as is currently permitted by Environment Protection Licence 20638.	deducted to allow for mobile plant in front of the stockpile and the sloping of the stockpile along the front (northern) edge, noting that the stockpile can be vertical against the pushwalls on the other three sides. This leaves approximately 850m^2 of floor area effectively available for stockpiling of waste. Given the push walls on three sides will be 6m high (with extension of the push walls on the southern and eastern sides), it is reasonable to assume that waste can be stacked to near the height of the push walls with appropriate plant such as a long-arm excavator with grapple attachment or waste handler. Therefore, an average stockpile height of 6.0m can be achieved noting that it may be slightly less at the walls and slightly higher in the centre and that allowance for the front sloping edge has been accounted for in the floor area. As Shed B has roof height of 11.84m, there is sufficient room for the plant to stack waste to this height. A conceptual diagram demonstrating this has been provided below.  If an average stockpile height of 5.8m is adopted across the effective stockpile floor area of 850m^2, this provides a stockpile volume of 4,930m^3, which supports the original estimate of 4,920m3. As such, no change to the stockpile estimate for unprocessed waste is considered necessary and no changes are proposed to the estimates of product storage bay capacity in Table 1-8. Consequently, the proposed site waste storage limit of 10,000 tonnes is considered to be appropriate.	
Noise and air quality		

Submission text	Response / comment	Reference
There may be limitations in the environmental assessment and specialist reports undertaken, particularly around the ability to receive, properly inspect, sort and process waste streams onsite appropriately given the number of truck movements required to achieve the proposed throughput. The proponent will need to revisit its environmental assessment and specialists reports to account for the proposed minimum standards to allow for a proper assessment to be undertaken, including whether any changes or refinements to the Proposal will have any bearing on noise and/or dust impacts.	An Amended Proposal description (Appendix A) has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Notably, these amendments include the closure of the facility, which would result in relative reductions in environmental impacts (particular as relating to air quality and noise) compared to the EIS. These changes include provisions made to ensure compliance with the proposed EPA minimum standards, discussed above. Additional assessment has been undertaken within Section 7 and Appendix H to Appendix J of this RtS to further assess the impacts associated with the Amended Proposal.	Amended Proposal description (Appendix A of this RtS) Section 7 of this RtS Appendix G to Appendix J of this RtS
Statutory compliance		
The Proponents approach to statutory compliance i.e. the willing and deliberate exceedance of the 30,000 tonne limit stipulated by both the Development Approval and Environment Protection Licence 20638 (the Licence) and the fact that SSD 7462 was a retrospective application to bring the Proponent into compliance	Minto Recycling Pty Ltd (a related entity of the Applicant), has undertaken ongoing consultation with the EPA, particularly in respect of throughput exceedances in the last annual reporting period for the EPL. Factors contributing to the increase in throughput received at the facility have been discussed with the EPA. Consequences of the Minto RRF not receiving waste volumes at the current, and future proposed, throughputs would include impacts to industry resource recovery rates (and more waste being sent to landfill), failure to reuse recoverable C&D waste, exacerbation in the shortfall of the C&D waste management capacity across Sydney, increase in transport of waste and loss of employment. The consequences would have detrimental social, environmental and economic impacts. The Amended Proposal seeks to increase the proposed throughput to 220,000 tpa, in line with market need and the EPA's priorities and objectives to improve operational practices within the C&D recycling industry. Addendum technical assessments have been undertaken to support the preparation of this RtS. These assessments have considered the change in operations since the EIS was originally prepared, including an assessment based on the current activities and throughput.	N/A

Submission text	Response / comment	Reference
Environmental issues		
That environmental issues exist due to the activities being undertaken at the Premises.	The EIS, exhibited in June 2017, did not identify any significant environmental impacts associated with the Proposal. Notwithstanding this, a number of design refinements have subsequently been made to further improve the environmental performance of the Minto RRF. The findings of the addendum technical assessments are presented in Section 7. The Amended Proposal aligns with the EPA objectives to improve operational practices within the C&D recycling industry and is in line with the EPA *Consultation paper - New minimum standards for managing construction and demolition waste in NSW*. The Amended Proposal would include the complete enclosure of the waste processing area within the Proposal site, and would include a number of additional measures (such as incorporation of an inground wheel wash) to improve environmental performance. The Addendum AQIA identified that the amendment made to the Proposal would have the potential to reduce PM_{10} and $PM_{2.5}$ emissions by approximately 46% and 23% respectively. The Addendum AQIA concluded that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally, relatively lower than those predicted in the EIS. Addendum assessments undertaken for other environmental aspects, including traffic and noise, concluded that no significant environmental impacts would arise as a result of the Amended Proposal.	Section 7 of this RtS Appendix G to Appendix J of this RtS
Proposed throughput		
That the Proponents current yearly total of waste received was likely to be around 200,000 tonnes and with this, the EPA had identified operational issues	An updated project description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.4.9 of the updated project description (provided in Appendix A) provides a description of the processing capacity and timing for the operation of the Amended Proposal, including activities and timing for waste disposal and collection. As noted in Section 1.4.9 the key operational processes include:	Amended Proposal description (Appendix A of this RtS)

Submission text	Response / comment	Reference
	• Waste disposal and collection timing and capacity • Waste processing timing and capacity • Timing and capacity for transfer of waste from the processing area to the stockpiling area • Waste storage capacity. The Amended Proposal description describes the time required to complete each of the above tasks noting that each of the activities could be undertaken simultaneously. As noted in Section 1.4.9 of Appendix A the operational hours required to complete each off the above tasks are fewer hours than the total available operational hours and that the facility is easily able to process the proposed throughput. Based on this analysis the facility is considered amply capable of processing the proposed throughput. Further, as noted above, the EIS, exhibited in June 2017, did not identify any significant environmental impacts associated with the Proposal. Notwithstanding this, a number of design refinements have subsequently been made to further improve the environmental performance of the Minto RRF. The findings of the addendum technical assessments are presented in Section 7. The Amended Proposal aligns with the EPA objectives to improve operational practices within the C&D recycling industry and is in line with the EPA *Consultation paper - New minimum standards.*	

4.2 Fire and Rescue NSW

A formal submission comprising a letter (dated 4 July 2017) was received from DPE. Several comments were provided and responded to in Table 4-3. Additional recommendations were provided by FRNSW on the on 9th February 2018 which relate to the preliminary responses provided within this RtS. These additional recommendations have also been responded to within Table 4-3.

Table 4-3 Response to Government Agency submission – Fire and Rescue

Submission	Response / comment	Reference
Recommendations:		
a) That Clauses E1.10 and E2.3 of Volume One of the National Construction Code (NCC) be complied with to the satisfaction of FRNSW. In particular, that the following aspects of the development be assessed and appropriately addressed: i) That stockpile storage within any building and/or open yard storage on the allotment be limited in size and volume and arranged to minimise the likelihood of fire spread.	An assessment of the Amended Proposal against the National Construction Code (NCC) – Building Code of Australia was included as Appendix N of the EIS (Fire safety study). Appendix K of this RtS provides a Fire Engineering Concept Design Statement incorporating the requirements of the BCA and providing recommendations for compliance during the detailed design phase has been prepared and is included as Appendix K of this RtS.	Appendix N of the EIS Fire Engineering Concept Design (Appendix K of this RtS)
ii) That the arrangement of stockpiles of combustible material, stored externally, on the allotment be sufficiently separated to permit Fire & Rescue NSW (FRNSW) vehicle access between stockpiles.		
iii) That the site is served by a fire hydrant system that has a minimum water supply capability appropriate to the site's largest stockpile's fire load.		
iv) That significant buildings used to process recyclable material are provided with a smoke hazard management system that facilitates Fire & Rescue NSW (FRNSW) firefighting operations.		
v) If deemed necessary, by virtue of applying Clauses E1.10 and E2.3 to the development, that any significant building used to process recyclable material is provided with an appropriate automatic fire suppression system.		
vi) That the site be provided with an effective means to contain an appropriate volume of contaminated fire water runoff. The capacity of containment to be commensurate with the concurrent discharge rate of the facility's hydraulic fire systems.		
Additional recommendations (9th February 2018)		

Submission	Response / comment	Reference
The responses below reiterate those previously provided in the Fire Engineering Concept Design Statement (FECDS) attached as Appendix K of this RtS. The scope of the FECDS is to develop a concept design to support a performance-based fire engineered design strategy for the building. This will be based on variations from the Deemed-to-Satisfy (DtS) provisions from the Building Code of Australia (BCA) / National Constriction Code (NCC) identified by the Private Certifying Authority (PCA). The Fire Engineering Brief (FEB) and Fire Engineering Report (FER) will be developed in the next phase of this project (i.e. Detailed Design). The Fire Engineering Brief Questionnaire (FEBQ) will represent the initial formal consultation and approval process with the relevant Approval Authority/s.		
FRNSW recommends that prior to the commencement of construction, that the design of the development is finalised in consultation with and to the satisfaction of FRNSW. This is recommended to include suitable additional provisions for special hazards by specifically addressing Clauses E1.10 and E2.3 of the NCC.	In consideration with the Environmental Impact Assessment and fire load, suitable water supply and fire fighting systems will be proposed and the same confirmed in the FEBQ, ie. 1. Automatic fire sprinkler system (Appropriate to Hazard Classification) 2. Fire Hydrant system (Water reticulation via a ring main) 3. Fire Hose Reels (Site & Hazard coverage) 4. Portable Fire Extinguishers (Type and size for appropriate Hazard)	-
Given the nature, type and quantity of the materials stored within the proposed building, FRNSW would be reticent to support a fire compartment of the proposed size without the relevant deemed to satisfy provisions of the NCC being applied (i.e. the relevant NCC deemed to satisfy provisions being those applicable to a large isolated building). Therefore, as a minimum FRNSW recommends that the proposed development attains compliance with the relevant NCC's performance requirements by application of the relevant NCC's deemed to satisfy provisions and applicable Australian Standards. The relevant provisions being those applicable to a fire compartment which exceeds the maximum floor area or volume limitations detailed within Table C2.2 of the NCC.	The DtS design requirements for Large-Isolated Building include but not limited to the provisions as outlined below: • C2.4 – Perimeter vehicle access • E1.3 – Ring main hydrant system • C2.3 – Sprinkler system and smoke hazard management. The Perimeter vehicle access is proposed to be addressed as part of an Alternate Solution with consideration to the building perimeter wall FRL in accordance with the Performance Requirements and the Fire Engineering Guidelines. The fire hydrant reticulation is proposed to create a ring main to NCC Cl. E1.3 and AS2419.1. The building is proposed to be provided with a sprinkler system with appropriate hazard classification in accordance with NCC Cl. E1.5 and AS2118.1. The smoke hazard management system under BCA DtS Provisions is dependent on the floor area and volume. It is proposed to be addressed as part of an Alternate Solution (i.e. natural smoke ventilation) in accordance with the Performance Requirements and the Fire Engineering Guidelines.	-

<table>
<tr><th>Submission</th><th>Response / comment</th><th>Reference</th></tr>
<tr><td></td><td>Proposed alternative solutions:
<table>
<tr><th>BCA Clause</th><th>Proposed departure</th></tr>
<tr><td>C2.2 – Area and Volume Limitations</td><td>Permit a compartment exceeding Type A Area and Volume limitations</td></tr>
<tr><td>D1.4 – Travel Distances</td><td>Permit travel distances exceeding 40 m to point of choice or an exit.</td></tr>
<tr><td>E4.8 – Design and Operation of Exit Signs</td><td>Permit exit signs to be located heights greater than 2.7 m above the floor level.</td></tr>
<tr><td>E1.3 - Fire Hydrants</td><td>Radiant heat shields</td></tr>
<tr><td>C2.4 - Perimeter vehicle access</td><td>Permit omission of FRNSW perimeter vehicle access with Alternative Solution proposal to reduce building perimeter wall FRL of 240/240/240. The provision of the automatic fire sprinkler system will be considered as part of the assessment in addition to drenching of the subject walls and structure.</td></tr>
</table></td><td></td></tr>
<tr><td>FRNSW recommends that the provisions for the containment of contaminated firewater for the proposed development should be justified given the increase in fire compartment size and fire load quantities. Provisions such as bunding of the proposed building and automatic isolation of the storm water system in the event of a sprinkler and/or fire hydrant system activation at the proposed site, are recommended to be finalised in consultation with and to the satisfaction of FRNSW.</td><td>It is proposed that bunding will be designed to accommodate the firewater from the activation of the automatic fire sprinkler system and/or the fire hydrant system.

The design will calculate the discharge rate of the said systems and permit firewater retention for the same as part of the hydraulic design documentation.</td><td>-</td></tr>
<tr><td>To ensure our operational requirements are satisfied, the proponent, and/or their nominated consultants, are recommended to be required to engage with FRNSW prior to</td><td>It is proposed to make formal application to FRNSW to engage with FRNSW to ensure the proposed design documentation of ALL fire safety provisions satisfy FRNSW requirements.</td><td>-</td></tr>
</table>

Submission	Response / comment	Reference
finalizing the design of the development's fire safety and containment systems.	It is also proposed to submit a formal Clause 144 application of the EP&A Regulations and liaise with FRNSW as part of the FEBQ formal process.	
Additionally, given the maximum volume having been exceeded, provisions for a fire hydrant ring main in accordance with AS2419.1-2005 have not been provided at the existing site or addressed within the FER. FRNSW considers the requirements for both perimeter access and fire hydrant ring main provisions to be appropriate measures for a large isolated building.	It is proposed to provide a fire hydrant ring main in accordance with NCC Cl. E1.3 and AS 2419.1 – 2005. It is proposed to address the perimeter access as part of an Alternative Solution given the site restraints in accordance with the Performance Requirements of the NCC and the Fire Engineering Guidelines.	-

4.3 Campbelltown City Council

A formal submission comprising a letter (dated 22 August 2017) was received from DPE. Several comments were provided and responded to in Table 4-4.

Table 4-4 Response to Government Agency submission – Campbelltown City Council

Submission text	Response / comment	Reference
Consultation		
The SEARs states that the proponent must 'consult with . . . nearby land owners and occupiers that may be affected by the proposal' (p. 5). While the EIS indicates that the proponent notified LANDOWNERS and invited comment on the application (Consultation Summary – Appendix B), it is unclear whether the consultation process included OCCUPANTS of neighbouring properties in Pembury Road. Given ongoing complaints about the site regarding issues such as dust emissions and traffic impacts, and visible evidence of dust emissions from the site, it is recommended that contact be made with neighbouring tenants to confirm that they were consulted.	Consultation is undertaken by the Applicant with neighbouring land owners on a regular basis. Community members were also consulted during the preparation of the EIS by written notification and through the Applicant's website, which provided the key details of the Proposal. A total of 258 landowners were contacted during the preparation of the EIS, far in excess of the area recommended for consultation during consultation between the Applicant and Council.	N/A
Traffic and transport		
It is noted that the proposed weighbridge is within 20 metres of the street. A significant number of incoming loads will be by truck and 'dog' tipper trailers. As this vehicle configuration is generally 19 metres in length, this would allow for only one vehicle to be queued directly behind the entry to the weighbridge. There is a risk of vehicles awaiting weigh-in queuing on Pembury Road across neighbouring properties' driveways. The proponent states that if necessary, queuing will take place on Airds Road rather than Pembury Road, and that vehicles will be called to the weighbridge via two-way radio. Observations indicate that queuing already takes place on Pembury Road with the current site operation, despite the existence of a two-way radio communication system. Given the proposal is to increase annual incoming tonnages from 30,000 tonnes per year to 220,000 tonnes per year (an increase of more than 700%), queuing is likely to become a far more significant issue, with the risk of driveways of neighbouring premises obstructed. It is recommended that should the development be approved, a condition be applied to ensure that queuing in	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received through the public exhibition process. The Amended Proposal would have two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. Provision of two inbound weighbridges would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles. An Addendum Traffic Impact Assessment (TIA) (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. Section 4.4 of the Addendum TIA provides an assessment of onsite stacking arrangements and the potential for queuing on Pembury Road. Based upon a maximum on-street queue length of one vehicle during the survey period, provision of an additional three stacking spaces, including the additional weighbridge, would provide sufficient capacity to eliminate queues in Pembury Road.	Section 6 of the RtS Addendum TIA (Appendix I of this RtS)

Submission text	Response / comment	Reference
Pembury Road is not permitted and that evidence that a management system for queuing in other locations is in place for the diverse range of vehicles and operators that would visit the site.	The original Proposal previously proposed the use of the kerbside road space on Airds Roads as a lay-over area for vehicles on approach to the proposal site which were not ready to be accepted at the Proposal site. Given that the Amended Proposal would be able to sufficiently accommodate the projected maximum number of vehicles in the peak hour under typical and worst-case conditions, this operation would no longer be required. Notwithstanding this, a draft TMP has been prepared to support the Addendum Proposal (provided in Appendix B of the Addendum TIA – Appendix I). The draft TMP shows that a traffic controller/ site personnel would manage pedestrian movements and vehicle movements at the Proposal site ingress.	
Page 112 of the EIS states that '. . . there is provision to stack vehicles at the site entry prior to passing over the weighbridge, which will reduce the likelihood of queuing extending into the road reserve'. The distance from the entry point of the weighbridge to the property boundary is approximately 20 metres. The width of the pavement between the weighbridge and the eastern boundary of the property is approximately 2.3 metres. The diagram in Figure 23 of the EIS shows two trucks stacked along the eastern boundary between the front of the property and the start of the weighbridge. It is significantly questionable as to whether stacking of vehicles will be practical in this confined area, especially given the need for a vehicle stacked in this location to reverse a significant distance in order to manoeuvre onto the weighbridge.	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received, including the provision of additional stacking spaces. As noted above, Section 4.3 and 4.4 of the Addendum TIA (provided in Appendix I) provides an assessment of onsite stacking arrangements and the potential for queuing on Pembury Road. At 220,000 tpa, the Amended Proposal is expected to generate a maximum of 54 two-way vehicle movements (27 vehicles) per hour. In theory, the 27 vehicles expected to arrive during this peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces, there would be 13 vacant stacking spaces remaining as illustrated in Figure 4.3 of the Addendum TIA. Trucks would not be required to reverse onto the weighbridge.	Section 6 of this RtS Addendum TIA (Appendix I of this RtS).
The application shows one single unloading area for all vehicles. The entrance into which the vehicle reverses to discharge the load is capable of receiving one vehicle only at a time. The Preliminary Environmental Assessment provides in Attachment B an extensive list of waste streams to be accepted, including among other items, virgin excavated natural material (VENM), building and demolition waste, soil, asphalt, garden waste, bulky goods waste, street sweepings, grits/sediments collected from stormwater management systems, office & packaging waste, vegetative waste from agriculture/horticulture, cured concrete waste from batching plants. By the nature of some of these materials and their origins, they will be delivered as pre-sorted loads, i.e. entire loads of VENM, entire loads of building and demolition waste, entire loads of	All loads would be visually inspected once deposited on the tip floor in accordance with the EPA *Consultation paper - New minimum standards for managing construction and demolition waste in NSW*. Therefore, to ensure all waste received is conforming waste, all waste must be deposited firstly onto the tip floor in Shed B. The advanced automated plant used to process waste at the Proposal site utilises a number of conveyors to pass waste through the processing system. Soil (<8mm), including VENM, is separated from the remainder of the waste stream early in the process and transferred via a separate conveyor along the eastern side of Shed C to the storage bay in Shed A. All other waste streams continue through the processing system with the remainder of the waste and following further screening are deposited within a storage bay in Shed C. Process waste streams are then transferred directly from Shed C to Shed A for storage.	-

Submission text	Response / comment	Reference
vegetation material, etc. Given the single unloading area proposed, for many loads the discharged waste will need to be cleared from the discharge area prior to the next vehicle's discharge, to prevent cross-contamination of waste streams. This may delay unloading, resulting in reduced vehicle movements per hour. More information is needed as to how the proponent proposes to maintain the integrity of each pre-separated waste stream. This is especially important for such streams as VENM and vegetative wastes, where avoidance of cross-contamination is imperative.		
The Transport Impact Assessment states that for inbound vehicles, '. . . waste is visually inspected by the Weighbridge Operator or Traffic Controller before unloading or immediately following unloading' (p. 16). Given the proposed high inbound traffic flow, it is highly questionable whether the weighbridge operator will be in a position to leave the office to inspect a load. If a load is to be visible from the weighbridge office, the office will need to be elevated to a height of approximately 3-4 metres. Similarly, a Traffic Controller would need to climb to a height of 3-4 metres to inspect loads and even then only the top layer of material will be visible. Given the high flow of incoming loads, how the Traffic Controller would move safely between that height and ground level with such frequency should be explored further with the proponent.	An updated project description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.4.10 of the Amended Proposal description (provided in Appendix A) provides a description of the process for suitably identifying non-conforming waste in vehicles entering the Proposal site. At the inbound weighbridge, site personnel visually identify waste carried by the vehicle. The purpose of this inspection is to be a fast and non-intrusive check to confirm that the waste material generally matches the description provided by the driver. Further, more thorough, visual inspections are undertaken once waste is tipped on the tipping floor and visual inspection area (as described in Section 1.4.10 of the Amended Proposal description). Site personnel conducting this inspection are situated on a platform above the weighbridge office which is elevated above the height of a truck stationed on the weighbridge itself. The waste material is inspected for any unauthorised waste, such as asbestos, on the surface of the load. A Draft Traffic Management Plan (TMP) has been prepared to support the Amended Proposal (provided in Appendix I. The Draft TMP outlines management measures for the onsite operation of vehicle movements as well as the roles and responsibilities of the traffic controllers.	Amended Proposal Description (Appendix A of this RtS) Addendum TIA (Appendix I of this RtS)
The Transport Impact Assessment states that some waste streams will be transferred by loader from Shed C to Shed A (p. 19). It should be confirmed that these movements were taken into account when assessing total on-site traffic movements.	Waste collection activities from Shed A and Shed C have been considered in the Amended Proposal. In Section 4.4 of the Addendum TIA (Appendix I of this RtS), a swept path assessment has been undertaken which considers a 25m B-double truck loading-up at each shed while a vehicle manoeuvres from the tip floor to the exit. The analysis indicates that these activities can take place concurrently without impeding traffic movements on-site. The swept path plans that show these traffic movements have been included in Appendix C of the Addendum TIA.	Addendum TIA (Appendix I of this RtS)

Submission text	Response / comment	Reference
Figure 4 in the Transport Impact Statement shows that a B-double vehicle can only manoeuvre on the site if it does so from close to the eastern boundary, and provided 4-5 vehicles shown stacked in Figure 2 are removed. It should be checked that this was taken into account when on-site vehicle stacking was calculated. Given the required area to manoeuvre a B-double vehicle, it is questionable whether B-doubles entering the loading site during peak traffic flow times (e.g. 7.00am to 4.00pm) is practical and desirable.	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would now include two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. Provision of two inbound weighbridges, compared to a single inbound weighbridge as proposed in the EIS, would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoid the conflict of entering vehicles giving way to exiting vehicles as detailed in Section 4.3 and Section 4.4 of the Addendum TIA (Appendix I). A B-double vehicle would be able to enter the site via the existing inbound weighbridge or the proposed additional inbound weighbridge and would now exit via the western outbound weighbridge (rather than back out the eastern inbound weighbridge as currently occurs) In theory, the 27 vehicles expected to arrive during this peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces, there would be 13 vacant stacking spaces remaining. The Addendum TIA (Appendix I) incorporates a swept path assessment which considers a 25m B-double truck loading-up at each shed while a vehicle manoeuvres from the tip floor to the exit. The analysis indicates that these activities can take place concurrently without impeding traffic movements on-site or onsite stacking spaces. The swept path plans that show these traffic movements have been included in Appendix C of the Addendum TIA. Therefore there is sufficient area for a B-double vehicle to access the site during the peak hour.	Section 6 of this RtS Addendum TIA (Appendix I of this RtS)
While the Transport Impact Assessment suggests that where possible outgoing loads will take place outside of peak times, it should be noted that this will not be possible for certain materials due to the operating hours of the facilities nominated in the EIS (p. 43). For example: • the only facility nominated for drop-off of green waste operates between 7am and 5pm Mondays to Fridays, and 7am and 4pm Saturdays	An Amended Proposal description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.4.9 of the updated project description (provided in Appendix A) provides a description of the processing capacity and timing for the operation of the Amended Proposal, including storage capacity, activities and timing for waste disposal and collection. As noted in Section 1.4.9 of Appendix A the time required to collect waste at the facility would be far less than the available operating hours providing flexibility in timing for when waste collection occurs. Waste collection vehicles would only require 4.5 hours per day to collect waste. There would therefore be sufficient additional operational hours available should additional waste collection be	Amended Proposal description (Appendix A of this RtS)

Submission text	Response / comment	Reference
• of the four facilities nominated for drop off of timber waste, the latest operating hours are between 7am and 5pm Mondays to Fridays, and 7am and 4pm Saturdays. These materials may therefore need to be stockpiled in Shed A overnight. Further inquiries are recommended to determine whether Shed A has sufficient capacity for overnight stockpiling of the anticipated volumes and if that quantity is suitable, having regard to fire safety and other relevant requirements.	required. Waste collection could therefore occur at a rate per day greater than the anticipated storage volume. Therefore through appropriate scheduling and management of waste collection vehicles, the storage capacity could be maintained to ensure stockpiles do not exceed the capacity of Shed A. Section 1.4.9 of Appendix A further describes the process of pre-loading that can occur where a receival facility may not be open at the time of waste collection.	
The Transport Impact Assessment states that 'material will not be transferred between Shed C and Shed A while waste collection trucks are being loaded' (p. 19). This will result in the conveyor between Shed C and Shed A stopping at various times during operation of the facility: it may take 20 minutes or more to load a B-double. This will have a flow-on effect of delaying the loading material from the floor in Shed B onto the conveyor in Shed C, which in turn will result in a backlog of waste on the floor, and consequently a delay in unloading customer vehicles. It should be confirmed that this delay was taken into account when onsite vehicle stacking was calculated.	As noted in Section 4.2.3 of the EIS waste would not be transferred between Shed C and Shed A by loader while waste collection trucks are being loaded, with the exception of soil which would be transferred by the conveyor. Halting the transfer of material by loader while a truck is loaded would not impact the operation of the conveyor which would continue to operate while waste collection vehicles are being loaded. An updated project description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.4.9 of the updated project description (provided in Appendix A) provides a description of the processing capacity and timing for the operation of the Amended Proposal, including activities and timing for the transfer of material between Shed B, Shed C and Shed A, concluding that the Proposal site can adequately process the proposed throughput of 220,000 tpa.	Section 4.2.3 of the EIS Amended Proposal description (Appendix A of this RtS)
The Traffic Impact Assessment states that 'Once light waste is separated in Shed C, a Liebherr Hydraulic Excavator transfers this waste from the waste storage bays onto waste collection trucks which transport the waste off-site'. (p. 19). This appears to indicate that materials will be loaded onto outbound trucks from both Shed C and Shed A. If so, there are no traffic flow diagrams to show this on-site vehicle movement. Further information should be sought as to whether these traffic movements were taken into account when assessing total on-site traffic movements.	Trucks would collect waste from Shed A and Shed C. Residual waste would be collected from Shed C while all sorted waste materials would be collected from Shed A. A swept path analysis has been carried out in Section 4.6 of the Addendum TIA (Appendix I). Swept path plans showing on-site vehicle movements are provided in Appendix C of the Addendum TIA. Movement of the excavator between Shed A and Shed C has been considered while assessing the site layout. The key movements for the excavator are as follows: • When there would be a waste collection truck loading-up adjacent to Shed A, the excavator would complete short movements between the waste storage bays within Shed A and a truck parked alongside Shed A. • When there is no waste collection truck loading-up, the excavator would transport waste from Shed C to Shed A. The scenario with the most constrained operating area on-site would involve the excavator moving between the two Sheds while a waste collection truck is	Addendum TIA (Appendix I of this RtS)

Submission text	Response / comment	Reference
	positioned next to Shed A. This scenario would rarely occur since the excavator would be positioned at Shed A loading-up the parked waste collection vehicle. Thus, if this were to occur, this would become the 'worst-case' scenario for excavator movements on-site. The latter scenario (i.e. worst-case scenario) has been assessed as part within the draft TMP. As illustrated in Appendix A of the draft TMP, if required, there would be sufficient space for the excavator to move between both Sheds without impacting parked trucks.	
The Traffic Impact Assessment states that peak traffic movements at the site take place between 9.00am-10.00am and 12.00pm-1.00pm (p. 26). Coincidentally, these times fall outside the peak local road network peak periods also provided in the report. Given the nature of the industry and the broad range of waste streams to be received, the claimed range of times for peak traffic movements at the site require further validation. It is recommended that to gain an accurate view of peak traffic movements at the site, the proponent be requested to produce all weighbridge data for the past 12 months.	An Addendum Traffic Impact Assessment (TIA) (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. The Addendum TIA provides an updated analysis of current and future proposed traffic generation in order to provide a robust, comprehensive and up to date analysis. The updated analysis included additional surveys, carried out between Tuesday 19th September and Monday 25th September 2017. During this period the peak hour was observed to occur between 6:00am and 7:00am. A summary of this traffic survey data is provided in Section 5.2 of the Addendum TIA. The vehicle profile (two-way vehicle movements) on an hourly basis during the site operation are provided in Table 5.2 of the Addendum TIA.	Addendum TIA (Appendix I of this RtS)
The Traffic Impact Statement states that the proposal 'aims to extend the time of operation from 7.00pm to 10.00pm . . . (and that the) traffic projection during evening and night periods is determined based on the site operator's project pipeline' (p. 27). Further, the report cites a number of 'notable' major infrastructure projects that have been secured in the site operator's 10-year project pipeline, which would account for the majority of evening and night-time deliveries. The ten projects listed are a considerable distance from the Minto site, and it is extremely unlikely that waste from any of these projects (with exception of possibly a small quantity from the 'Western Sydney Infrastructure Plan') would be transported to the Minto site. In fact for all of the major infrastructure projects listed, waste loads from these sites destined for Minto would be transported directly past, or in close proximity to other waste management facilities owned by the operator that are much closer to the project sites. It would therefore appear to make no economic sense to transport the waste from these project sites to the Minto facility.	The Minto Recycling facility is centrally located within the City of Campbelltown local government area to service the current high level of residential construction in the Greater Macarthur Priority Growth Area, South West Priority Development Area and in the Campbelltown-Macarthur region generally, both in the provision of waste management services and the supply of construction materials (mostly aggregates, soils). The region is currently experiencing rapid population growth and associated construction works and infrastructure projects, supported by the South West Priority Development Area plan. Minto Recycling is a unique facility within the south-west region with capacity to process mixed waste using advanced, largely automated processing. There are a limited number of other facilities in the Sydney region that specialise in processing mixed C&D waste as Minto Recycling does, or that employ advanced mechanical processing systems to maximise recovery of resources from this stream. While other C&D recycling facilities may be located closer to key transport infrastructure projects in the Sydney region, many of these C&D recycling facilities use basic sorting techniques such as manual picking from the tipping floor (by hand or with a grapple attachment on an excavator) and many tend to focus on recovery of metals, soils and masonry materials (concrete, brick, tiles) from single-stream or	N/A

Submission text	Response / comment	Reference
It is therefore recommended that the proponent's offer of the major infrastructure projects as justification for the extended hours of operation, be subject to further scrutiny.	cleaner loads, which make up the majority of the C&D stream (by weight) and are relatively easy to recover with basic screening and crushing equipment. The Amended Proposal seeks to increase the proposed throughput to 220,000 tpa, in line with market need and the EPA's priorities and objectives to improve operational practices within the C&D recycling industry. Addendum technical assessments have been undertaken to support the preparation of this RtS. These assessments have considered the change in operations since the EIS was originally prepared, including an assessment based on the current activities and throughput.	
Air quality		
Page 6 in the EIS states that 'The site operator implements stringent environmental controls for the current facility'. Inspection of the current site operation and consideration of Council's compliance history at the site, provided under separate cover, suggests that this statement is at best uninformed.	Minto Recycling Pty Ltd (a related entity of the Applicant), has undertaken ongoing consultation with the EPA, particularly in respect of throughput exceedances in the last annual reporting period for the EPL. Amendments to the Proposal have been proposed to respond to submissions and further managed potential impacts from the Proposal. These have been described in Section 6 of this RtS. Key environmental controls included in the Amended Proposal design include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings. The Amended Proposal seeks to increase the proposed throughput to 220,000 tpa, in line with market need and the EPA's priorities and objectives to improve operational practices within the C&D recycling industry. Addendum technical assessments have been undertaken to support the preparation of this RtS. These assessments have considered the change in operations since the EIS was originally prepared, including an assessment based on the current activities and throughput. The assessment presented in the EIS and addendum assessments in this RtS demonstrate that environmental impacts associated with construction and operation of the Amended Proposal would be within acceptable limits. These potential impacts would be further managed with the implementation of the proposed management and mitigation measures.	Section 6 of this RtS

Submission text	Response / comment	Reference
The site operation results in substantial migration of airborne particulate matter from the site, on Pembury Road. Vehicles parked in Pembury Road near the premises can be seen to be heavily covered in particulate matter. In addition, particulate matter can be seen along the length of Pembury Road between the turning circle adjacent to the premises, up to Airds Road. This issue is so significant that the site operator employs a small road sweeper for much of the day attempting to reduce dust emissions from vehicles driving over the particulate matter. This of course does not address the issue of large amounts of particulate matter washing down the stormwater system then into Bunbury-Curran Creek.	An Amended Proposal description (Appendix A) has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.2 of the updated Amended proposal description (provided in Appendix A) provides a description of environmental controls, including air quality mitigation within the Amended Proposal. Key environmental controls included in the Amended Proposal design include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the amendments made to the Proposal following the exhibition of the EIS. As identified in the Amended AQIA the predicted incremental and cumulative TSP and dust deposition levels at receptors are below all relevant assessment criteria. With the provision of the key environmental controls and mitigation measures as outlined above, the Amended Proposal is not anticipated to have a significant dust impact on nearby receptors. Roof water from the existing sheds would continue to be managed by the existing stormwater system. This water is currently directed into an underground 100 kL rainwater tank for re-use at the site. Flows in excess of the tanks capacity would be directed to the Stormwater 360 Filter Chamber for treatment prior to discharge. Water from the roof of the enclosed shed (to be constructed as part of the Amended Proposal) and from external hardstand areas would be captured by the upgraded pit and pipe system. Existing stormwater pits are fitted with EnviroPod Gross Pollutant Traps (GPTs) to provide primary treatment of the site runoff prior to the downstream stormwater treatment system. An updated MUSIC model has been developed to assess changes to water quality from Amendments to the Proposal and the results are presented below.	Amended Proposal description (Appendix A of this RtS) Addendum AQIA (Appendix H of this RtS) Appendix D of this RtS

<table>
<tr><th>Submission text</th><th>Response / comment</th><th>Reference</th></tr>
<tr><td></td><td>
<table>
<tr><th rowspan="2">Pollutant</th><th rowspan="2">Target %</th><th colspan="3">Proposed Development</th></tr>
<tr><th>Predicted Reduction in pollutant load %</th><th>Target achieved</th><th>Predicted Mean Annual Discharge Loads (kg/yr)</th></tr>
<tr><td>Gross pollutants</td><td>N/A</td><td>94.2</td><td>Yes</td><td>10.6</td></tr>
<tr><td>TSS</td><td>80</td><td>87.6</td><td>Yes</td><td>65</td></tr>
<tr><td>TP</td><td>45</td><td>64.7</td><td>Yes</td><td>0.53</td></tr>
<tr><td>TN</td><td>45</td><td>45</td><td>Yes</td><td>8.3</td></tr>
</table>

As identified above the proposed treatment system will meet Council’s objectives for gross pollutants, TSS, TP and TN for the proposed development.

Water captured within the processing shed would be treated as leachate. Proposal buildings have been designed to exclude stormwater flows and the grading and drainage of internal hardstand areas within sheds has been designed to contain any leachate. Bunds would be constructed at the shed openings to provide separation of leachate and stormwater. Water within the processing shed would drain to a blind sump within the processing area. Existing pits as indicated on the stormwater design, would be completely sealed to prevent water entering the pits. Leachate collected within the blind sump would be pumped out and trucked for disposal at an appropriately licensed facility. Updated stormwater designs, demonstrating how stormwater would be separated from leachate (water collected within enclosed shed areas) have been provided in Appendix D of this RtS.</td><td></td></tr>
<tr><td>The SEARs include ‘risk assessment of the potential environmental impacts of the development . . .’, and ‘a description of the measures that would be implemented to avoid, minimise and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage any significant risks to the environment’ (p. 3) and specifically in respect of air quality and odour, ‘details of proposed mitigation, management and monitoring measures’ (p. 4).The application does not appear to</td><td>See response above. All vehicles exiting the site will now do so via the western driveway, via the new inground wheel wash.</td><td>N/A</td></tr>
</table>

Submission text	Response / comment	Reference
adequately address how migration of airborne dust from the operation, and dust and silt being taken off the premises by trucks onto the road and into the stormwater system, will be addressed. While a wheel-wash is provided for vehicles exiting from the eastern driveway, it is strongly recommended that a wheel-wash also be installed for vehicles exiting from the western driveway.		
The EIS gives mention to misting systems to suppress dust. It is recommended that clarification be sought, and that ALL buildings where waste is moved have misting systems installed and operational for dust suppression purposes. It would be in the operator's best interests to maintain these dust suppressions systems for its own work health and safety compliance too.	The Amended Proposal as described in Appendix A includes the provision of an enclosed shed that would contain operational activities. As described in Section 6 of this RtS, as part of the Amended Proposal the existing dust suppression and sprinkler system would be extended to cover activities within the enclosed shed and the shed entry and exit areas. The extended dust suppression system is shown in Appendix D of this RtS. As identified in the Amended AQIA (Appendix H) and summarised in Section 7 of this RtS, the predicted incremental and cumulative TSP and dust deposition levels at surrounding receptors would be below all relevant assessment criteria.	Section 6 and 7 of this RtS Amended Proposal description (Appendix A of this RtS) Addendum AQIA (Appendix H of this RtS) Stormwater and misting plans (Appendix D of this RtS)
For items leaving the site via Shed A, the Transport Impact Assessment appears to show the vehicle loading area uncovered and in the open, a considerable distance from Shed A, rather than within the building (Diagram 15, p. 16). Experience suggests this is likely to result in the generation of high volumes of airborne particulate matter as vehicles are loaded. The suggested practice of an employee applying a hose to suppress dust during the loading process is considered unlikely to be effective. It is recommended that ALL unloading and loading of vehicles must be conducted inside buildings that are fitted with either misting systems or negative-pressure air-filtration systems.	The Amended Proposal as described in Appendix A includes the provision of an enclosed shed that would contain operational activities. As described in section 6 of this RtS, as part of the Amended Proposal the existing dust suppression and sprinkler system would be extended to cover activities within the enclosed shed and the shed entry and exit areas. The extended dust suppression system is shown in Appendix M of this RtS.	Appendix A of this RtS Appendix M of this RtS.
The EIS states that a yet-to-be prepared Air Quality Management Plan would address 'procedures to handle potential odour generating wastes such as green waste or hidden putrescible wastes'. It is recommended that the proponent be required to provide more detail regarding this proposed control measure in advance of receiving an approval.	Limited quantities of green waste would be accepted at the Proposal site within other 'mixed waste' streams. However, it is expected that this would represent less than one per cent of the waste held on the Proposal site at any one time and less than 3,000 tonnes handled per annum. Any green waste found mixed within other waste streams would be appropriately separated and removed from site before decomposition begins to generate odour.	N/A

Submission text	Response / comment	Reference
	Additional air quality controls (which would help control odour) have been incorporated into the Amended Proposal design, including: • Enclosing site sorting and handling activities within a site shed • The provision of an inground wheel wash facility for all outgoing vehicles • The provision of a CoolMist system within the enclosed shed. • Upgrades to external dust suppression and sprinkler systems. In light of the above odour risks associated with the Amended Proposal are considered to be low.	
Waste		
The application appears to show no detail of the separate storage areas within Shed A for each of the many nominated waste streams. For single-stream loads such as VENM, it seems unusual that the load is discharged into Shed B where care must be taken to prevent cross-contamination. It may appear more logical to discharge single-stream loads directly into Shed A.	Section 1.4.4 of the Amended Proposal description (Appendix A) describes the waste storage arrangements, including the bay size areas, locations and waste types. Processed waste would be separate by waste type within both Shed C and Shed A. All loads would be visually inspected once deposited on the tip floor in accordance with the EPA Consultation paper - New minimum standards for managing construction and demolition waste in NSW. Therefore, to ensure all waste received is conforming waste, all waste must be deposited firstly onto the tip floor in Shed B. It is estimated that around 5% of the waste received at the Proposal site is VENM. VENM is not a residual waste stream from the Proposal. All waste received at the site (excluding non-conforming waste) would be processed through the advanced automated plant to be spilt into separate residual waste components. The advanced automated plant used to process waste at the Proposal site utilises a number of conveyors to pass waste through the processing system. Soil (<8mm), including VENM, is separated from the remainder of the waste stream early in the process and transferred via a separate conveyor along the eastern side of Shed C to the storage bay in Shed A. All other waste streams continue through the processing system with the remainder of the waste and following further screening are deposited within a storage bay in Shed C. Processed waste streams are then transferred directly from Shed C to Shed A for storage.	Section 4 of the EIS. Amended Proposal description (Appendix A of this RtS)
Council has reviewed the Environment Protection Licenses that are listed in Table 7 in Section 4 of the EIS and found that two EPL's were not valid. EPL 2794 was surrendered in 2001 and EPL 10638 did not yield a result in the EPA Public Register. The proponent should be required to address this matter and	An Amended Proposal description has been prepared and included as Appendix A of this RtS. Section 1.4.3 of the Amended Proposal description provides updated information on tipping facilities and their EPLs.	Appendix A of this RtS

Submission text	Response / comment	Reference
validate the destinations of products emanating from the processing of input waste streams.		
	Unexpected finds refers to hazardous or non-conforming waste items which on occasion may be discovered in the received materials. These non-conforming materials will be managed in accordance with the asbestos and non-complying waste management procedures.	
A material category “Unexpected Finds” also nominated in Table 7, is a catch-all heading to group other non-target waste streams that may be received at the facility, and is simply an unacceptable description for a facility of this scale. Given that the proponent is an experienced waste processing business, it should be required to identify the “other” streams expected and nominate their end disposal locations, with accompanying EPL details.	Non-conforming materials are materials that do not fall within the accepted waste streams as described in section 4.2.1 of the EIS. The disposal facility for non-conforming waste is difficult to predict as the exact type and volumes of non-conforming waste cannot be identified. In addition, the facilities to which waste is delivered vary frequently due to market conditions, gate fees, capacity to accept material and waste acceptance criteria. This situation is expected to continue to be the case for the life of the facility. Non-conforming and hazardous wastes will be disposed of at facilities that are appropriately licenced to accept that waste. Non-conforming materials would be stored within bins on the eastern side of the site until it can be disposed of at an appropriately licenced facility. Hazardous materials would be stored within the hazardous materials bins on the eastern side of the tipping floor until they can be disposed of at an appropriately licenced facility.	Section 4.2.1 of the EIS

5 RESPONSE TO COMMUNITY SUBMISSIONS

5.1 Community submissions

This section provides a summary of the submissions raised by the community and special interest groups. Submissions received from the community have been grouped and responded to by environmental aspect, within Table 5-2. A summary of the key issues raised is provided in Section 3 of this RtS. A community submission reference table linking each numbered community submission with their DPE assigned number has been provided as Table 5-1 below.

Table 5-1 Community reference table

Submitter #	DPE #
1	218414
2	220180
3	219028
4	220337
5	220351
6	220361
7	220366
8	219730
9	217268
10	# not provided (owner of 16 Pembury Road)
11	# not Provided (Findlay Consulting Engineers)

Table 5-2 Response to community submissions

Issue	Description	Submitter #	Response / comment	Reference
General				
	The current amending application provides no more technical support for the amending application than the original amending submission.	(11)	Additional assessment has been undertaken to support the Amended Proposal as presented in this RtS. Additional assessment relating to the following environmental aspects has been undertake: • Visual impact and built form • Noise and vibration • Air quality, odour and climate change • Hazards • Waste soils and water • Contamination • Access, Traffic and Parking • Biodiversity The details of these assessments have been provided in Section 7 of the RtS. Overall, the assessment identifies that the Amended Proposal would, subject to the implementation of updated mitigation measures, result in no substantial environmental impacts in addition to those identified within the EIS.	Section 7 of the RtS
	Unfortunately, this amending application prepared by Arcadis Australia does not change the application from that previously submitted, and rejected,	(11)	Section 6 of the RtS provides a detailed description of the amendments to the Proposal. A number of amendments to the Proposal have been made to respond to submissions provided by government agencies and the community, as part of design progression and to minimise impacts to the surrounding environment. Additional assessment has been undertaken to support the Amended Proposal as presented in this RtS. The details of these assessments have been provided in Section 7 of the RtS.	Section 6 of the RtS Section 7 of the RtS

Issue	Description	Submitter #	Response / comment	Reference
			Overall, the assessment identifies that the Amended Proposal would, subject to the implementation of updated mitigation measures, result in no substantial environmental impacts, in addition to those identified within the EIS.	
Traffic and transport				
Vehicle queuing off-site	Vehicles waiting to enter the site queue outside the site on Pembury Road and Airds Road, resulting in traffic delays and problems for surrounding local businesses. This queuing would be significantly increased if there was a breakdown or delay in the plant at the site, as has happened in the past.	(1), (2), (3), (4), (5), (6), (10), (11)	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would now include two inbound weighbridges at the eastern driveway, and a single outbound weighbridge at the western driveway. Provision of two inbound weighbridges, compared to a single inbound weighbridge as proposed in the EIS, would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles. Section 6.3 and 6.4 of the Addendum TIA (provided in Appendix I) provides an assessment of onsite stacking arrangements and the potential for queuing on Pembury Road. At 220,000 tpa, the Amended Proposal is expected to generate a maximum of 54 two-way vehicle movements (27 vehicles) per hour. In theory, the 27 vehicles expected to arrive during this peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces, there would be 13 vacant stacking spaces remaining with no queuing on Pembury Road anticipated. A Draft Traffic Management Plan (TMP) has been prepared to support the Amended Proposal (provided in Appendix I). The Draft TMP outlines management measures for the onsite operation of vehicle movements. In the event that the Amended Proposal site experiences equipment failure, if there is a vehicle accident or congestion within the site an Emergency Plant	Section 6 of the RtS Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			Breakdown Operation Action Plan has been developed as outlined in Section 5.2 of the draft TMP.	
	Queuing of vehicles off-site reduces safe access for other vehicles making deliveries to or belonging to customers visiting surrounding businesses.	(3) (4)	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would have two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. Provision of two inbound weighbridges would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles. An Addendum Traffic Impact Assessment (TIA) (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. Section 4.4 of the Addendum TIA provides an assessment of onsite stacking arrangements and the potential for queuing on Pembury Road. Based upon a maximum on-street queue length of one vehicle during the survey period, provision of an additional three stacking spaces, including the additional weighbridge, would provide sufficient capacity to eliminate queues in Pembury Road.	Section 6 of this RtS Addendum TIA (Appendix I of this RtS)
	The Transport Impact Assessment does not provide details of the management and responsibilities of implementing the contingency plan of queuing vehicles in the kerbside lane on Airds Road.	(5), (10)	As noted and described in Section 6 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would now include two inbound weighbridges at the western driveway, and a single outbound weighbridge at the eastern driveway. Provision of two inbound weighbridges, compared to a single inbound weighbridge as proposed in the EIS, would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles,	Section 6 of this RtS Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			clearing vehicles from the driveway and avoid the conflict of entering vehicles giving way to exiting vehicles as detailed in Section 4.3 and Section 4.4 of the Addendum TIA (Appendix I of this RtS). The original Proposal previously proposed the use of the kerbside road space on Airds Roads as a lay-over area for vehicles on approach to the Proposal site which were not ready to be accepted at the Proposal site. Given that the Amended Proposal would be able to sufficiently accommodate the projected maximum number of vehicles in the peak hour under typical and worst-case conditions within onsite stacking spaces, this operation would no longer be required. Notwithstanding this, a draft TMP has been prepared to support the Addendum Proposal (provided in Appendix B of the Addendum TIA - Appendix I). The draft TMP shows that a traffic controller/ site personnel would manage pedestrian movements and vehicle movements at the Proposal site ingress.	
	Limited vehicle stacking spaces are available on-site, so multiple vehicles cannot wait on-site to be loaded or unloaded, resulting in backlog into the surrounding road network. The traffic impact assessment does not adequately consider the staging of vehicles within the site.	(2), (4), (5), (6), (10)	The Addendum TIA (provided in Appendix I) provides an assessment of the worst-case vehicle scenario, based on the updated existing conditions information and to assess the amendments made to the Proposal following the exhibition of the EIS, including provision of additional onsite stacking spaces. Section 4.4 of the Addendum TIA analysed stacking arrangements using a 'worst case' duration of 30 minutes on-site. Fourteen stacking spaces would be required during the worst-case scenario. As noted in Section 6 of the Addendum TIA, the Amended Proposal would provide an increase in the number of stacking spaces provided onsite compared to the EIS Proposal, but would require fewer spaces (as a result of increased operational efficiency reducing predicted traffic volumes). As a result even during the worst-case scenario, queuing of vehicles would be entirely accommodated and managed within the Proposal site and would not cause impact on Pembury Road. In theory, the 27 vehicles expected to arrive during the peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces,	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			there would be 13 vacant stacking spaces remaining as illustrated in Figure 4.3 of the Addendum TIA. The stacking plan for the future site operation, the estimated number of stacking spaces required associated with a throughput of 220,000 tpa and swept paths are provided in Appendix C of the Addendum TIA.	
	The company claims they are going to provide an unloading stacking facility for 17 vehicles with the largest size vehicle to be stacked is a 26 meter long "B" double with a load capacity of 65 tonnes. That equates to an area of 52 meters long 2,50 meters wide and 14 meters high. That means that to load and unload the stacked loaded trucks would also require a significant space for the movement of the vehicles during un loading. I have not visited the internal operation of the facilities but from my office which looks directly into the Bingo facilities, finding an area large enough to accommodate the stacking of vehicles is another question.	(11)	A total of 21 vehicle stacking spaces would be provide onsite. Vehicles would wait in stacking spaces prior to proceeding to the tipping floor to unload waste. Detailed on-site vehicle stacking plans are provided in the Addendum TIA (Appendix I of the RtS).	Appendix I of the RtS
Maximum number of trucks on-site	Non-operator trucks, including public deliveries, are not required to schedule arrival times. As a result, there may be too many trucks arriving on-site at one time. The maximum number of trucks permitted to be on-site should be defined to avoid this situation.	(2), (5), (10)	As noted in Section 6 of the Addendum TIA, the Amended Proposal would provide an increase in the number of stacking spaces provided onsite compared to the EIS Proposal, but would require fewer spaces (as a result of increased operational efficiency reducing predicted traffic volumes). As a result even during the worst-case scenario, queuing of vehicles would be entirely accommodated and managed within the Proposal site. The maximum number of vehicles anticipated to arrive at the Proposal site within any given hour can be accommodated within the Proposal site. Notwithstanding this, a draft TMP has been prepared to support the Addendum Proposal (provided in Appendix B of the	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			Addendum TIA - Appendix I) including measures to manage scheduling of trucks arriving at the Proposal site.	
Parking on Pembury Road	Bingo vehicles double park on surrounding roads, reducing parking availability for others, blocking driveways and preventing customers from accessing surrounding businesses.	(1), (3)	As noted and described in Section 8 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would now include two inbound weighbridges at the western driveway, and a single outbound weighbridge at the eastern driveway. Provision of two inbound weighbridges, compared to a single inbound weighbridge as proposed in the EIS, would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoid the conflict of entering vehicles giving way to exiting vehicles as detailed in Section 4.3 and Section 4.4 of the Addendum TIA (Appendix I). In light of the above, the Amended Proposal does not have any requirement for parking of Bingo vehicles on local roads.	Section 8 of this RtS Addendum TIA (Appendix I of this RtS)
	The TIA states that Pembury Road has the capacity to accommodate increased traffic volumes, but this is not correct with existing levels of traffic and does not reflect the current state of parking availability on Pembury Road.	(2), (5), (10), (11)	As noted an Addendum TIA (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. The Addendum TIA provided an updated analysis of current and future proposed traffic generation in order to provide a robust, comprehensive and up to date analysis. Pembury Road is a two-way undivided road with one lane per direction. For this road classification, the Roads and Maritime's stipulates a threshold of 900 passenger car units (pcu) per hour per lane as shown in Figure 3.4 of the Addendum TIA. Traffic surveys identify Wednesday as having the highest number of vehicle movements on Pembury Road. The highest number of vehicles recorded is 93 westbound vehicles between 5:00am and 6:00am. When compared against Roads and Maritime's 900 pcu per hour threshold, 93 vehicles per hour is considered low. Therefore, the roadway currently operates with traffic volumes well within its operational capacity threshold set within	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			Roads and Maritime's Guidelines highlighting that there is currently operating with significant additional capacity.	
Safety of surrounding road networks	Bingo vehicles drive unsafely on the surrounding road networks, increasing danger for staff and visitors of surrounding businesses. A collision has previously occurred when vehicles when waste trucks were queued on Air Road and Pembury Road.	(1), (2), (3), (4), (5), (10)	A Draft TMP has been prepared to support the Amended Proposal (provided in Appendix I). The Draft TMP outlines the processes that are to be followed by all vehicles using the facility and operational staff. The Bingo street sweeper must maintain a high level of professional conduct when in Pembury Road as per the Bingo Truck Driver Code of Conduct detailed in Section 5.3 of the draft TMP. The Amended Proposal would have two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. Provision of two inbound weighbridges would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles. Based upon a maximum on-street queue length of one vehicle during the survey period, provision of an additional three stacking spaces, including the additional weighbridge, would provide sufficient capacity to eliminate queues in Pembury Road.	Addendum TIA (Appendix I of this RtS)
	The street sweepers that is deployed to manage dust levels is unsafe in sweeping the road, as it slows and disrupts surrounding traffic, performs u-turns and creates slippery roads. The driver drives in the middle of the road and does not move over for oncoming traffic.	(2), (5), (6), (8)	A Draft TMP has been prepared to support the Amended Proposal (provided in Appendix I). The Draft TMP outlines the processes that are to be followed by vehicles and operational staff. The Bingo street sweeper must maintain a high level of professional conduct when in Pembury Road as per the Bingo Truck Driver Code of Conduct detailed in Section 5.3 of the draft TMP. Further, as noted in Section 8 of this RtS, a number a amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would fully enclose the waste processing operational area of the Proposal site, provide a new in ground wheel wash and extend or include a range of additional dust mitigation features. The Amended Proposal would therefore	Section 8 of the RtS Addendum TIA (Appendix I of this RtS) Addendum AQIA (Appendix H of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			minimise the risk of dust impacting Pembury Road resulting in a reduction in the operational requirements for the street sweeper. An Addendum Air Quality Impact Assessment (provided in Appendix I) has been prepared to quantify the reduction in potential dust impacts associated with the Amended Proposal.	
	Pedestrians have been hit by trucks in the past, as queuing of vehicles reduces visibility and increases the danger level of the surrounding streets for vehicles and pedestrians.	(3)	As noted and described in Section 8 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would have two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. Provision of two inbound weighbridges would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles. Notwithstanding this, a draft TMP has been prepared to support the Addendum Proposal (provided in Appendix B of the Addendum TIA - Appendix I). The draft TMP shows that a traffic controller/ site personnel would manage pedestrian movements and vehicle movements at the Proposal site ingress.	Section 8 of this RtS Addendum TIA (Appendix I of this RtS)
	Bingo trucks arrive to the site uncovered and leave debris on the street, resulting in dangerous road conditions.	(4)	A Draft TMP has been prepared to support the Amended Proposal (provided in Appendix I). The Draft TMP outlines the process that are to be followed by all vehicles using the facility. Specifically, Bingo truck drivers must maintain a high level of professional conduct as per the Bingo Truck Driver Code of Conduct, which includes a commitment to ensuring all loads are covered, detailed in Draft TMP.	Addendum TIA (Appendix I of this RtS)
Visibility	Parked trucks reduce visibility along Airds Road and Pembury Road, as: • Trucks leave their lights on which temporarily blinds drivers of	(4)	As noted and described in Section 8 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received. The Amended Proposal would now include two inbound weighbridges at the western driveway, and a single outbound weighbridge at the eastern driveway. Provision of two inbound	Section 8 of this RtS Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
	vehicles travelling in the opposite direction • Pedestrians cannot safely see around trucks when crossing the road.		weighbridges, compared to a single inbound weighbridge as proposed in the EIS, would increase stacking capacity between Pembury Road and the two inbound weighbridges from two stacking spaces to five stacking spaces, including the additional weighbridge. This would improve operation of the Proposal site as it would increase the operator's ability to accept vehicles, clearing vehicles from the driveway and avoid the conflict of entering vehicles giving way to exiting vehicles as detailed in Section 4.3 and Section 4.4 of the Addendum TIA (Appendix I). The original Proposal proposed the use of the kerbside road space on Airds Roads as a lay-over area for vehicles on approach to the Proposal site which were not ready to be accepted at the Proposal site. Given that the Amended Proposal would be able to sufficiently accommodate the projected maximum number of vehicles in the peak hour under typical and worst-case conditions within onsite stacking spaces, this operation would no longer be required.	
Increased traffic volume	The proposal would result in a significant increase in traffic volume to the roads surrounding the site. The Transport Impact Assessment does not adequately consider the impacts of increased traffic volumes. The road network is already at a peak volume and cannot support the increased capacity proposed.	(1), (2), (3), (4), (5), (6), (7), (10), (11)	As noted an Addendum TIA (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. The updated analysis found that, compared to current conditions, the Amended Proposal would result in an additional eight two-way vehicle movements (4 vehicles) during the morning road network period and five two-way vehicle movements (3 vehicles) during the afternoon road network period.	Addendum TIA (Appendix I of this RtS)
Increased traffic volume	The Transport Impact Assessment does not address traffic management on the access to the site from Pembury Street	(4), (11)	A Draft TMP has been prepared to support the Amended Proposal (provided in Appendix I). The Draft TMP outlines management measures for the onsite operation of vehicle movements and the management of the access to the Proposal site from Pembury Street. Trucks would enter the site via the eastern driveway and exit the site via the western driveway. The 'one way' traffic route through the Proposal site, shown in Figure 5 of the Draft TMP, has been designed to minimise risk of collisions and accidents occurring within the site and at the Proposal site access. The Draft TMP shows that a traffic controller/ site personnel would	Addendum TIA (Appendix I of this RtS

Issue	Description	Submitter #	Response / comment	Reference
			manage pedestrian movements and vehicle movements at the Proposal site ingress.	
Transport routes	The bridges on Airds Road and Ben Lomond Road are not rated for B-double vehicles, so B-doubles take a circuitous route which increases traffic in the surrounding area.	(1)	Although the alternate route via Pembroke Road seems circuitous, it is deemed as required given the recent bridge load limit restrictions which have been implemented on Airds Road and Ben Lomond Road. As assessed in the Original TIA, the alternate route is deemed acceptable on the basis that Pembroke Road is a wide road located in an industrial area that is regularly used as a haul route by surrounding businesses for large trucks, and forms the shortest alternative route to the Proposal site. According to RMS' Higher Mass Limit (HML) and Restricted Access Vehicle RAV map and the National Heavy Vehicles Regulator (NHVR), the alternate route is approved for use by vehicles up to 25m in length. Based on the current and future split of vehicles, 19m semi-trailers, 19m truck and dogs and 25m B-doubles collectively comprise 25% of all vehicles arriving at the site (Table 4.2 of the Addendum TIA). Therefore, up to a quarter of site-generated traffic would need to use the alternate route. Currently, there are 211 two-way movements generated by the Minto RRF during the busiest day (Table 3.2 of Addendum TIA). A quarter of these movements equates to approximately 53 two-way movements in one day. On average, this equates to four heavy vehicle movements per hour on Pembroke Road across a 13-hour operational day. Traffic movement surveys on Pembroke Road were undertaken across 24 hours each day during the survey week in September. The surveys indicate that, on average, Pembroke Road carries around 20,000 two-way movements (bi-directional) per day. Daily traffic generated by the Minto RRF which use Pembroke Road (53 movements) make up less than 1% of the daily flows on Pembroke Road (20,000 movements). Overall, site generated traffic is a minuscule portion of all traffic on Pembroke Road. Furthermore, the site-generated four heavy vehicle movements per hour on Pembroke Road has a minor impact on the existing road. It is noted that this calculation conservatively considers all semi-trailers, truck and dogs and B-double trucks travelling via the alternate route. Empty B-double trucks en route to the Proposal	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			site (to collect waste) would weigh less than 32 tonnes and would use the regular route when travelling to the Minto RRF. Overall, these vehicles would comprise a small number of these movements. Thus, they have been included in the four vehicle movements for ease of estimation. Traffic surveys show the maximum number of vehicle movements on Pembroke Road in any given hour is 904 movements per lane per direction. This occurs on Thursday in the southbound direction between 4:00pm – 5:00pm. Pembroke Road is a two-way divided road with one lane per direction. RMS' Guide to Traffic Generating Developments stipulates a threshold of 1,000 passenger car units (pcu) per hour per lane for this roadway classification. Given that the current peak hourly flow remains less than the threshold, the detour along Pembroke Road is considered to be acceptable to accommodate existing heavy vehicle flows generated by the facility. In the future, it is estimated that the Proposal site would generate 331 two-way movements in a single day (Table 4.1). A quarter of these movements equates to approximately 83 two-way movements in one day. On average, this equates to five heavy vehicle movements per hour on Pembroke Road across a 16-hour operational day. As with the estimation above, this calculation conservatively considers all semi-trailers, truck and dogs and B-double trucks travelling via the alternate route. In comparison to the existing 20,000 daily vehicle movements on Pembroke Road, an estimated 83 heavy vehicle movements which would utilise the detour would still contribute to less than 1% of all traffic along this route. This is a minor portion of traffic along the road network, and would not be expected to have an impact on Pembroke Road. Furthermore, on an hourly basis, the Proposal site's operation would be expected to generate one additional heavy vehicle movement per hour in comparison with current operation (4 to 5 movements). An increase of one heavy vehicle movement would not cause an adverse impact on Pembroke Road given that five movements per hour, or one movement every 12	

Issue	Description	Submitter #	Response / comment	Reference
			minutes, is considered to be minor and is not expected to cause interruptions to existing traffic flow. In relation to RMS' acceptable levels of operational capacity, the current 904 vehicle movements per lane per direction in the peak hour would increase by one movement in the future (ie. 905 pcu (passenger car units)). The maximum flows remain below RMS' operational capacity threshold of 1,000 pcu for flows on a two-way divided urban road. Overall, the proposed alternate haul route via Pembroke Road for heavy vehicles accessing the Proposal site has been assessed as being acceptable."	
On-site parking	Car parking for employees working at the RRF is not provided on-site. The Amended Proposal does not provide visitor parking. We often have Bingo staff parking on our front lawn and when challenged they answer by claiming that Bingo have instructed staff to park on our lawn.	(11)	As noted and described in Section 7 of this RtS a number of amendments have been made to the Proposal following the exhibition of the EIS in response to submissions received, including the provision of additional onsite car parking. The Amended Proposal includes provision of 17 car parking spaces, including one accessible parking space; increased from 10 spaces previously proposed. Given that the maximum number of personnel onsite at any one time would be 15 people, the provision of 17 car parking spaces for staff and visitors is sufficient. No employees would be required to park in Pembury Road. Applying BCA's accessible parking rate generates a requirement to provide 0.16 accessible parking spaces, or at least one parking space, for the Amended Proposal. An accessible space would be located between the ingress driveway and site office as shown in Section 4.7 of the Addendum TIA.	Section 7 of the RtS Section 4.7 of the Addendum TIA (Appendix I)
	There are a number of National Transport Companies that also have facilities located in Pembury Road Minto that also impact on the road use of Pembury Road.	(11)	The Addendum TIA (provided in Appendix I) provides an assessment of the capacity of Pembury Road to accommodate traffic generated by the Proposal. As detailed in Section 3.7 of Appendix I of the RtS, RMS' Guide indicates that the operational capacity of Pembury Road is around 900 pcu per hour per lane. Future traffic flows along Pembury Road consider current flows plus anticipated additional future site traffic.	Appendix I of the RtS

Issue	Description	Submitter #	Response / comment	Reference
			In the busiest hour, the Amended Proposal is estimated to generate a maximum of 20 additional vehicle movements (34 existing to 54 future movements). When added to the peak existing flow on Pembury Road, the number of vehicles per lane per hour in the future continues to remain well below RMS' threshold of 900 pcu per hour per lane. Therefore, the traffic flows along Pembury Road are considered acceptable under the Proposal site's operating conditions. Having regard to the above, the road currently operates with traffic volumes well within its operational capacity threshold set within RMS' Guide.	
	In addition they also have provided details of the types and size of vehicles using Pembury road Bingo facilities. Unfortunately the amended submission the user numbers do not add up as they have no control over the size and type of vehicle currently being unloaded.	(11)	As noted, an Addendum TIA (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. The Addendum Assessment included undertaking up to date surveys of the existing conditions of the Proposal site. Section 3.4 of the Addendum TIA (provided in Appendix I) provides a detailed description of the types of waste delivery and collection vehicles accessing the Proposal site. Section 4.4 of the Addendum TIA provides an indicative breakdown of the anticipated proportion by vehicle type for a peak hour period. Bingo vehicles currently account for the majority of vehicles depositing waste at the Proposal site. Waste deliveries to the Proposal site, undertaken by the site operator's fleet, would be scheduled with the operator prior to the waste leaving its point of origin. Currently, the site operator utilises a live logging system which allows customers to log a request via telephone or via a mobile application (app) that is exclusive to the site operator. All requests are centrally managed by the Customer Service and Allocations Team at the Head Office in Auburn. The role of the Allocations Team would be to determine suitable vehicles to collect the waste and designate the facility that is best suited to accept the delivery. The Allocations Team determines these details based on the information provided by the customer at the time of request. Consequently the site operator have a	Appendix I of the RtS

Issue	Description	Submitter #	Response / comment	Reference
			significant amount of control over the size and type of vehicles accessing the site.	
Air quality				
Deposited dust	Wind-blown dust originates from the site and covers surrounding roads, parked cars and businesses, negatively affecting machinery and business performance and creating visibility and safety issues. Additional throughput will make this problem worse.	(1), (2), (3), (4), (5), (6), (8), (9), (11)	An Amended Proposal description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.2 of the updated Amended proposal description (provided in Appendix A) provides a description of environmental controls, including air quality mitigation within the Amended Proposal. Key environmental controls included in the Amended Proposal design include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the amendments made to the Proposal following the exhibition of the EIS. As identified in the Amended AQIA the predicted incremental and cumulative TSP and dust deposition levels at receptors are below all relevant assessment criteria. With the provision of the key environmental controls and mitigation measures as outlined above, the Amended Proposal is not anticipated to have a significant dust impact on nearby receptors.	Amended Proposal description (Appendix A of this RtS) Addendum AQIA (Appendix H of this RtS)
	Given that Minto is located in a valley, airborne dust does not leave the area and settles in residential areas.	(3)	An assessment of air quality impacts from the Proposal has been provided in Section 6.4 and Appendix M of the EIS. This assessment has been updated to include amendments to the Proposal and is presented in Section 7 and Appendix H (Addendum AQIA) of this RtS. Both the EIS and addendum assessments have been modelled utilising local metrological conditions in accordance with NSW Environment Protection Authority (NSW EPA) Approved Methods for the Modelling and	Addendum AQIA (Appendix H of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			Assessment of Air Pollutants in New South Wales (Published January 2017). As identified in the Addendum AQIA, with the provision of environmental controls potential pollutant emissions from the Proposal including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally, relatively lower than those predicted in the EIS.	
	The soil and water assessment does not adequately consider the accumulation of deposited dust off-site, or the limitations of the existing street cleaning system.	(4)	An updated project description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Section 1.2 of the updated Amended proposal description (provided in Appendix A) provides a description of environmental controls, including air quality mitigation within the Amended Proposal. Key environmental controls included in the Amended Proposal design for managing off site water quality impacts associated with dust deposition include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings. The Addendum Air Quality Impact Assessment (Appendix H) prepared for the Amended Proposal included an assessment of dust deposition impacts on nearby receptors. The assessment identified that the predicted incremental and cumulative dust deposition levels at all receptors is below all relevant assessment criteria. With the provision of the key environmental controls and mitigation measures as outlined above, the Amended Proposal is not anticipated to have a significant dust impact on nearby receptors. Nevertheless, the street sweeper would be maintained on site as a contingency measure for usage as/when required.	Amended Proposal description (Appendix A of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Dust tracked by vehicles	Dust is tracked by vehicles leaving the site and deposits in surrounding roads and businesses. Street sweepers do not adequately address the levels of dust being generated, and mix the dust with water to deposit mud onto streets and vehicles.	(1), (9), (11)	A number of key environmental controls have been provided within the Amended Proposal (described in Appendix A) to manage tracking of dust from exiting vehicles. Key environmental controls included in the Amended Proposal design include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings With the provision of the key environmental controls and mitigation measures as outlined above, the Amended Proposal is not anticipated to have a significant dust impact on nearby receptors. Nevertheless, the street sweeper would be maintained on site as a contingency measure for usage as/when required.	Appendix A of this RtS
	Air quality impact assessment does not adequately address existing and proposed levels of particulate matter generated by vehicles entering or leaving the site, and existing management measures are not sufficient to control the issue.	(2)		
Health impacts	Concerns about dust generation from the site resulting in health impacts from breathing in the dust. Bingo requires its employees to wear masks but does not give any air health information to surrounding land holders. Coughing and bloodshot eyes have been exacerbated since Bingo moved to the area. Sometimes there is a strange smell. Bingo continuously checks the site for asbestos, and if there is asbestos it will be unhealthy to breathe in.	(3), (4), (10)	The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the Proposal including amendments made to the Proposal following the exhibition of the EIS. The assessment identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally relatively lower than those predicted in the EIS. As described in Section 4.2 of the EIS, the Proposal would not accept hazardous materials, including asbestos. Vehicles would be pre-screened at the entry weighbridge to determine whether the load is compliant for acceptance. Any load deemed non-compliant would exit the Proposal site via the exit weighbridge and the wheel wash. However, on occasion items may be discovered in the received materials that contain hazardous substances. These non-complying materials will be managed in accordance with the asbestos and non-complying waste management procedures. Hazardous materials would be securely stored (until they can be disposed of at an appropriately licenced facility) within the hazardous materials bins on the eastern side of the tipping floor.	Addendum AQIA (Appendix H of this RtS) Section 4.2 of the EIS

Issue	Description	Submitter #	Response / comment	Reference
			As the site would not accept hazardous materials and in consideration of the measures outlined above, the risk of asbestos dust emission to air is very low.	
Lack of monitoring data	Deposited dust modelling was not undertaken using existing data from the site. An estimation of current emissions was based on data from the NPI for Mining and the USEPA AP42 rather than monitoring of existing impacts.	(4)	The AQIA (Appendix M of the EIS) and Addendum AQIA (Appendix H of this RtS) have been undertaken in accordance with NSW Environment Protection Authority (NSW EPA) *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (Published January 2017). Emissions factors for site activities have been derived from the NPI for Mining and USEPA AP42 in the absence of industry-specific factors relating to waste handling. As the USEPA AP42 document for aggregate handling are related to the handling of overburden material and it is considered that the material to be handled as part of the Project operations will result in the emission of significantly less particulate emissions, the resulting assessment is considered to be conservative. A detailed description of emission factors and modelling methodologies is provided in Appendix M of the EIS (AQIA). The Addendum AQIA identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally, relatively lower than those predicted in the EIS.	Addendum AQIA (Appendix H of this RtS)
EPLCompliance	The facility does not comply with its EPL, which states that 'Activities must be carried out in a manner that minimises the generation of dust from the premises'	(4)	The proposed development would result in significantly reduced dust generation compared to current operations. This significant reduction in dust leaving the site boundaries should result in minimal dust deposition as well as silt and sediment build up. The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the Proposal including amendments made to the Proposal following the exhibition of the EIS. The assessment identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally relatively lower than those predicted in the EIS. Amendments to the Proposal have been designed in consideration of current throughput levels and as demonstrated in this RtS would suitably mitigate dust related impacts.	Addendum AQIA (Appendix H of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Water quality				
Sedimentation	Sediment from the site, including sediment from the street sweeper, enters drains and waterways.	(1), (4), (6)	The Amended Proposal (Appendix A) includes a range of controls for managing stormwater impacts including: • Construction of a shed and roof structure to enclose the existing waste processing and handling area. No stormwater will come into contact with waste stockpiles. • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • The hardstand surface area of the site has altered slightly with an additional hard stand car park and some additional 'non hardstand' landscape areas. • All roof and external hardstand water generated would be passed through the stormwater treatment device prior to discharge to council drains. • Additional dust suppression sprinklers outside the buildings near the weighbridges have been installed. An updated stormwater model has been developed to assess changes to water quality from Amendments to the Proposal. The model identifies that the proposed treatment system will meet Council's objectives for gross pollutants, TSS, TP and TN. The proposed development will also result in significantly reduced dust generation than current operations.	Section 6.6 of EIS (Appendix I of the EIS) Section1.2 of Amended Proposal Description
Canal pollution	Contamination from the site may enter the nearby canals that carry rainwater.	(10)	A key element of the Amended Proposal (Appendix A) includes Construction of a shed and roof structure to enclose the existing waste processing and handling area. This will result in the majority of the site, with the exception of an area at the front of the facility where there is car parking and landscaping will be covered therefore removing any contact of stormwater with waste being stored on site. All stormwater generated on site is passed through a gross pollutant trap that treats the stormwater by removing any solids wastes and significant reducing particulates and nutrient levels. The proposed development will also result in significantly reduced dust generation to what is currently occurring off site. This significant reduction in dust leaving the site boundaries should result in minimal dust deposition as well as silt and sediment build up.	Section 1.2 of Amended Proposal Description Section 6.6 of EIS (Appendix I of the EIS)

Issue	Description	Submitter #	Response / comment	Reference
Contamination				
Asbestos	Land may be contaminated with asbestos. Bingo employees are continuously checking for Asbestos on-site.	(1), (3), (11)	Section 6.7 of the EIS presents assessment findings for soil and groundwater contamination risks associated with the Proposal. The site is covered with hardstand therefore removing the potential for asbestos to contaminate on-site soil. During construction, the existing site levels will be retained and any ground disturbance will be minimal and limited to excavation for footings only. As such the risk of encountering asbestos contamination is considered low. The Minto facility does not accept asbestos waste and therefore Bingo's operational procedures include the inspection of all wastes received for asbestos so it can be immediately removed from site in the event it is encountered.	Section 6.7 of the EIS (Appendix J of the EIS)
	Procedures for the rejection of non-complying waste are not sufficient, and are likely to result in the handling of asbestos at the site.	(4)	As described in Section 4.2 of the EIS, the Proposal would not accept hazardous materials, including asbestos. An updated project description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. As noted in Section 1.4.10 of the Amended Proposal Description (Appendix K) vehicles would be pre-screened at the entry weighbridge to determine whether the load is compliant for acceptance. Any load deemed non-compliant would exit the Proposal site via the exit weighbridge and the wheel wash. However, on occasion items may be discovered in the received materials that contain hazardous substances. These non-complying materials will be managed in accordance with the asbestos and non-complying waste management procedures. Hazardous materials would be securely stored (until they can be disposed of at an appropriately licenced facility) within the hazardous materials bins on the eastern side of the tipping floor. In the event Asbestos is delivered to the site, identified during the inspection and immediately removed from site, it will not result in contamination of the soil onsite as the site is covered with hardstand.	Section 4.2 of EIS Amended Proposal Description (Appendix A of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			As the site would not accept hazardous materials and in consideration of the measures outlined above, the risk of asbestos dust emission to air is very low.	
	There is no appropriate provision for the management of asbestos, which may pose a risk to workers at the site and surrounding businesses, and to the environment.	(4)	An Amended Proposal description has been prepared to describe amendments made to the Proposal following the exhibition of the EIS and to provide additional clarification regarding the Amended Proposal's operations. Key procedures for managing non-conforming waste, including asbestos are described in Section 1.4.10 of the Amended Proposal Description (Appendix A). Non-conforming waste would be handled in accordance with Bingo's 'Systems and procedures for managing non-conforming waste'. Any trucks containing non-compliant waste would be directed off-site. Vehicles would be pre-screened at the entry weighbridge to determine whether the load is compliant for acceptance. Any load deemed non-compliant would exit the Proposal site via the exit weighbridge and the wheel wash. Key procedures for managing non-conforming waste will be outlined in the Proposals Operational Environmental Management Plan (OEMP), and may include: • Checking and inspection of incoming waste prior to its stockpiling or processing to minimise the risk of non-conforming material in processed and recovered waste materials. Waste that has been tipped onto the tipping floor would be spread to approximately 100 mm thick so that each load can be visually inspected. • Rejection of waste loads that may contain non-conforming material to prevent acceptance of non-conforming materials • Recording details of non-complying waste generators • Review of the waste processing systems in line with EPA requirements, • Increasing the level of appropriate and safe recycling of waste in a sustainable and environmentally sound manner.	Amended Proposal Description (Appendix A of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Noise and vibration				
Traffic noise	The Noise and Vibration Impact Assessment did not assess the impacts of road traffic noise on residential receivers adjacent to the surrounding road network.	(2), (11)	The Addendum NVIA (provided in Appendix G of this RtS) includes a detailed traffic noise assessment, prepared in accordance with NSW EPA Road Noise Policy (RNP). In accordance with the RNP, road traffic noise impacts from the Amended Proposal were assessed on Campbelltown Road and Pembroke Road, as sub-arterial roads with adjacent sensitive receptors. An assessment of existing road traffic noise identified that noise levels at the most noise affected receivers along these roads exceeds the RNP day and night criteria. The RNP 2 dBA 'allowance' criterion therefore applies for the amended Proposal. The addition of vehicles from the Amended Proposal would increase road traffic noise levels by 0.1 dBA and 0.2 dBA during the daytime (7am – 10pm) and morning shoulder (6am – 7am) periods respectively on Campbelltown Road and Pembroke Road. These increases are considered negligible and are within the 2dBA 'allowance' criterion. According to EPA's Road Noise Policy, a noise increase of up to 2 dB represents a minor impact that is considered barely perceptible to the average person.	Addendum NVIA (Appendix G of this RtS)
	The traffic noise generated from Bingo vehicles is increasing risks in the surrounding area	(10), (11)	An Addendum NVIA (provided in Appendix G of this RtS) has been prepared to provide additional information and further assess, the potential noise and vibration impacts associated with the Amended Proposal. The addendum assessment indicates that the operational noise levels at surrounding receptors would be reduced (when compared to those presented in the EIS) at most of the assessment locations as a result of the enclosure of the site. Minor noise increase are anticipated at six industrial receptor locations due to the noise emanating from the openings at the entry and exit of the enclosed shed. However, these increases would be minor and the total noise levels would continue to comply with relevant noise criteria.	Addendum NVIA (Appendix G of this RtS)
On-site noise	The noise generated at the site is increasing risks in the surrounding area	(10)	The Addendum NVIA (provided in Appendix G of this RtS) includes a detailed traffic noise assessment, prepared in accordance with NSW EPA Road Noise Policy (RNP).	Addendum NVIA (Appendix G of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			In accordance with the RNP, road traffic noise impacts from the Amended Proposal were assessed on Campbelltown Road and Pembroke Road, as sub-arterial roads with adjacent sensitive receptors. An assessment of existing road traffic noise identified that noise levels at the most noise affected receivers along these roads exceeds the RNP day and night criteria. The RNP 2 dBA 'allowance' criterion therefore applies for the amended Proposal. The addition of vehicles from the Amended Proposal would increase road traffic noise levels by 0.1 dBA and 0.2 dBA during the daytime (7am – 10pm) and morning shoulder (6am – 7am) periods respectively on Campbelltown Road and Pembroke Road. These increases are considered negligible and are within the 2dBA 'allowance' criterion. According to EPA's Road Noise Policy, a noise increase of up to 2 dB represents a minor impact that is considered barely perceptible to the average person.	
Hazard and risk				
Waste fire	The facility may experience a fire, resulting in health issues and litigation, as has occurred at a recycling centre in Victoria, and require emergency services.	(1)	A Fire Safety Study was included as Section 6.9 and Appendix N of the EIS. The study recommended a number measures to manage fire risk during operation of the Proposal. With the implementation of these measures the fire risk at the Proposal site is considered to be minimal.	Section 6.9 of the EIS Addendum NVIA (Appendix G of this RtS)
Socio-economic				
Loss of business	Dust and contaminants from the site result in dust in factories, machinery and products belonging to surrounding businesses. Vehicle-based businesses are required to wash customers' cars due to heavy dust levels, increasing staff and operational costs.	(1), (2)	A number of key environmental controls have been provided within the Amended Proposal (described in Appendix A) to manage the generation of dust from exiting vehicles. Key environmental controls included in the Amended Proposal design include: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings	Addendum Proposal description (Appendix A of this RtS) Addendum AQIA (Appendix H of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
			With the provision of the key environmental controls and mitigation measures as outlined above, the Amended Proposal is not anticipated to have a significant dust impact on nearby receptors. The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the Proposal including amendments made to the Proposal following the exhibition of the EIS. The assessment identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally relatively lower than those predicted in the EIS.	
	The expansion of the processing capacity of the site and increased level of vehicles will have a negative impact on surrounding businesses.	(4), (6), (7)	The EIS and this RtS demonstrate that the impacts to nearby receptors from construction and operation of the Proposal would be minor and within acceptable limits.	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Real estate devaluation	Property values in the area will be reduced due to increased deposited dust levels, rubbish falling off Bingo trucks, the quality of the non-permanent sheds on-site and increased industrialisation of the area.	(6), (9), (11)	The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the Proposal including amendments made to the Proposal following the exhibition of the EIS. The assessment identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally relatively lower than those predicted in the EIS. A Draft TMP has been prepared to support the Amended Proposal (provided in Appendix I).The Draft TMP outlines the process that are to be followed by Bingo trucks. Bingo truck drivers must maintain a high level of professional conduct as per the Bingo Truck Driver Code of Conduct, which includes a commitment to ensuring all loads are covered for vehicles exiting the Proposal site, detailed in Draft TMP. The structures to be built on site including the enclosed shed would be permanent and built to a high standard using industrial quality materials suitable for the application. The Proposal involves modifications and upgrades to an existing facility and does not require a change in a land use. The Proposal site is located within an existing industrial area and is greater than 300 metres away from the nearest residential receptor. The EIS and this RtS demonstrate that the impacts to nearby receptors from construction and operation of the Proposal would be minor and within acceptable limits.	Addendum AQIA (Appendix H of this RtS) Addendum TIA (Appendix I of this RtS)
Project development and alternatives				
Interstate transport	Waste will be transported to Queensland due to reduced landfill fees. If the waste was taken to a landfill in NSW, traffic impacts would be reduced.	(1)	As noted an Addendum TIA (provided in Appendix I) has been prepared to provide additional information regarding, and further assess, the potential traffic impacts associated with the Amended Proposal. The updated analysis found that, compared to current conditions, the Amended Proposal would result in an additional eight two-way vehicle movements (4 vehicles) during the morning road network period and five two-way vehicle movements (3 vehicles) during the afternoon road network period. The impacts on the surrounding network are therefore considered to be minor.	Addendum TIA (Appendix I of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Suitability of location	The scale and intensity of the proposal is not consistent with the existing industrial uses within the industrial estate.	(4)	The Proposal involves modifications and upgrades to an existing facility and does not require a change in a land use. In addition to increasing the throughput at the site a number of environmental controls have been proposed within the Amended Proposal (see Section 6) to manage potential impact associated with construction and operation, including: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings The EIS and this RtS demonstrate that the impacts to nearby receptors from construction and operation of the Proposal would be minor and within acceptable limits.	Section 6 of this RtS
	Minto is not a high density industrial area, and should remain so.	(6)		
	The Minto industrial area is prime real estate. The proposal should not be located in this area.	(10)		
	The Minto industrial area has a working population density comparable to typical residential densities. Due to the air quality and noise impacts of the development, the proposal would be more suitable in a semi-rural area.	(9)	The Addendum Air Quality Assessment (provided in Appendix H) provides an assessment of the Proposal including amendments made to the Proposal following the exhibition of the EIS. The assessment identified that potential pollutants, including TSP, Dust, PM_{10} and $PM_{2.5}$ would all be below the relevant assessment criteria and are generally relatively lower than those predicted in the EIS. An Addendum Noise and Vibration Impact Assessment (provided in Appendix G of this RtS) has been prepared to provide additional information and further assess, the potential noise and vibration impacts associated with the Amended Proposal. The addendum assessment indicates that the operational noise levels at surrounding receptors would be reduced (when compared to those presented in the EIS) at most of the assessment locations as a result of the enclosure of the site. Minor noise increase are anticipated at six industrial receptor locations due to the noise emanating from the openings at the entry and exit of the enclosed shed. However, these increases would be minor and the total noise levels would continue to comply with relevant noise criteria.	Addendum NVIA (Appendix G of this RtS) Addendum AQIA (Appendix H of this RtS)

Issue	Description	Submitter #	Response / comment	Reference
Type of buildings	The quality of the sheds on-site is not the permanent quality that other businesses maintain. The proposal should maintain Minto's high quality industrial environment.	(6)	The structures to be built on site including the enclosed shed would be permanent and built to a high standard using industrial quality materials suitable for the application.	N/A
Types of large machinery	The amending application does not identify the number and type of large machinery that is required to operate on the floor	(11)	Section 1.4.2 of the consolidated project description (Appendix A of the RtS) provides a list of equipment that would be used as part of the Proposal.	Section 1.4.2 of Appendix A of the RtS
General objection	The proposed increased capacity will make traffic, air and noise pollution significantly worse and should not proceed.	(2)	The Proposal involves modifications and upgrades to an existing facility and does not require a change in a land use. In addition to increasing the throughput at the site a number of environmental controls have been proposed within the Amended Proposal (see Section 6) to manage potential impact associated with construction and operation, including: • Construction of a shed and roof structure to enclose the existing waste processing and handling area • Installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point • Extension of the dust suppression and sprinkler system across the new shed and its openings The EIS and this RtS demonstrate that the impacts to nearby receptors from construction and operation of the Proposal would be minor and within acceptable limits. A number of mitigation measures have also been proposed to manage impacts from the Proposal. A summary of mitigation measures has been provided in Section 6.11 of the EIS. Additional mitigation measures to manage impacts from amendments to the Proposal have been proposed in Section 7 of this RtS.	N/A
	The assessment of the proposal fails to appropriately demonstrate how impacts will be managed. There are significant health, safety and environmental concerns associated with the proposed increase in operations.	(4)		Section 6.11 of the EIS Section 7 of this RtS
	Objection to increased processing capacity.	(7)		
	Objection to a recycling business.	(9)	As outlined in Section 3 of the EIS, the strategic direction for waste management in New South Wales is determined by the State Government, in particular the NSW Environment Protection Authority (NSW EPA). The current strategic direction is set out in the *NSW Waste Avoidance and Resource Recovery Strategy 2014–21* (the Strategy) which strongly	Section 3 of the EIS

Issue	Description	Submitter #	Response / comment	Reference
			supports diversion of waste from landfill and greater recycling back into productive uses, in accordance with the established waste hierarchy. For construction and demolition (C&D) waste, the Strategy sets a target to recover 80% of the stream across the state by 2021-22. The proposed development would play an important role in managing C&D waste and contributing to the State Government's policy objectives around resource recovery. the facility is significant in the context of the state's recycling targets. No data is available on C&D waste generation and recycling within Sydney but the site's impact in the context of the Sydney market will be significant. The Amended Proposal plays an important role in recovering valuable resources that would otherwise go to landfill, in support of the State Government's strategic ambitions. It is strongly aligned with, and contributing to, the Government's recovery target for the sector. The Minto Facility also supports several local businesses within the Minto Industrial Park.	

6 AMENDED PROPOSAL

The Proposal involves the construction and operation of increased processing capacity from 30,000 tpa to 220,000 tpa at the existing waste and resource recovery facility in Minto.

Amendments are now proposed to the Proposal based on submissions provided by government agencies and the community, as part of design progression, and to provide additional clarity where relevant.

Further detail on the amendments to the Proposal has been provided to supplement the Proposal description as provided in the EIS. These amendments represent an addendum to that Proposal description and together form the Amended Proposal. Approval is sought for the Amended Proposal, in accordance with Part 4, Division 4.1 of the EP&A Act.

This section of the RtS provides a description of the amendments to the Proposal and associated changes to the built form, construction and operation of the Proposal. Where no amendment has been made to the Proposal there has been no further discussion within this RtS.

An assessment of the potential environmental impacts of the Amended Proposal based on the detail provided below, is included within Section 7 of this RtS.

A consolidated description of the Amended Proposal, including the Proposal (as presented in the EIS) and taking into consideration amendments to the Proposal (as detailed in this section) is provided in Appendix A.

6.1 Overview of Amendments

Amendments to the Proposal, for which approval is sought as part of the Amended Proposal include:

- Construction of a shed and roof structure to enclose the waste processing and handling area
- Minor removal of internal shed walls and cladding
- Adjustments to the location of the proposed site office and amenities buildings and the provision of additional on-site parking spaces
- Alterations to landscaping
- Extension of a dust suppression and sprinkler system
- Minor changes and additions to internal infrastructure and operational layout
- Removal of the existing above-ground wheel wash and installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point
- Relocation of the 30,000 L self-bunded fuel tank closer to the rear of Shed A.

Further environmental assessment of the abovementioned amendments to the Proposal is provided in Section 7 of this RtS.

6.2 Justification

Justification for the Amended Proposal is presented in Section 3 of the EIS. This section provides an update to that analysis in the context of the amendments to the Proposal.

The amendments to the Proposal described and assessed in this RtS:

- Are in response to the submissions received and consultation undertaken regarding the Proposal, and/or

- Are a result of design progression which recognises opportunities to optimise the operation of the facility whilst minimising environmental impacts.

The specific need for each of the amendments to the Proposal is discussed in Table 6-1 below.

Table 6-1 Justification for the amendments to the Proposal

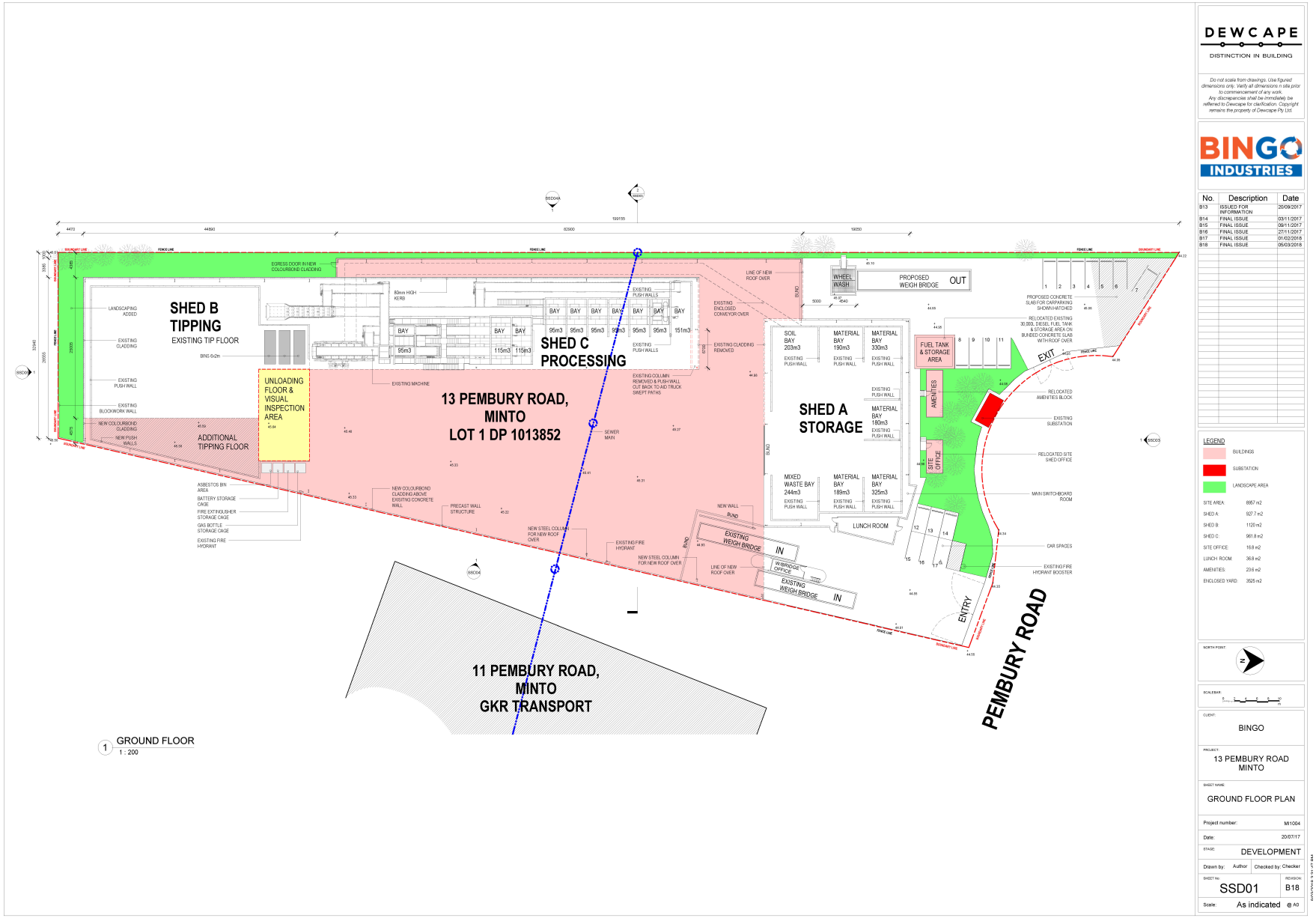
Amendment to the Proposal	Amendment driver	Justification
New shed and roof structure	Response to submissions	As part of the submissions received on the Proposal and in consultation with DP&E and the EPA during the public exhibition period, it was identified that there were further opportunities available to minimise dust impacts of the Proposal on adjacent properties. The Amended Proposal provides an opportunity to mitigate dust impacts through provision of a new roof / shed structure that would enclose the operational areas of the Proposal site. Enclosing the site would mitigate dust impacts by reducing dust emissions to the atmosphere from on-site activities and would align the site with EPA objectives regarding enclosing all resource recovery facilities under the proposed minimum recycling standards for construction and demolition waste.
Minor removal of minor walls and cladding	Design progression	Current site operations allow two directional vehicle flow, with direction dependent on whether the vehicle is depositing or receiving materials. Conflicting vehicle movements reduce site efficiency, impact on site safety and can result in queueing on to Pembury Road. The Proposal as presented in the EIS simplified these movements by proposing a one-way vehicle circulation through the site with entry through the eastern Pembury Road gate. Based on additional site surveying it has been identified that increased vehicle route widths within the site are required to safely accommodate the swept path of the largest vehicles that utilise the site. Removal of a small extent of wall and cladding from both Shed A and Shed C would provide a wider area for vehicles to manoeuvre, enhancing safety and operational efficiency.
Adjustments to the location of the site office and amenities buildings and increased parking provisions	Response to submissions	As part of the submissions received on the Proposal during the public exhibition period, it was requested that additional on-site parking is provided to minimise parking impacts from staff parking on Pembury Road. To enable additional stacked parking spaces the site office has been relocated around 5 metres to the west. To enable the utilisation of addition parking spaces on the north western corner of shed A the site amenities building has been relocated around 5 metres to the east. This would allow an additional three parking spaces and one accessible parking space to be provided on the eastern side of the exit driveway adjacent to the proposed location for the relocated fuel tank.

Amendment to the Proposal	Amendment driver	Justification
		Further parking would also be provided in the north western corner of the site, requiring the removal of landscaping in this area. As a result of these adjustments, the Amended Proposal would provide seven additional parking spaces across the site for a total of 17 spaces.
Alterations to landscaping	Design progression	To accommodate changes to the site office location and new parking provisions, minor areas of landscaping on the northern boundary of the Proposal site would be removed. Additional landscaping would be provided along the southern and western boundaries of the Proposal site to compensate for this reduction.
Extension to dust suppression and sprinkler system	Design progression	As a result of the new roof structure, dust suppression and sprinkler systems would need to be extended to ensure they continue to operate effectively and cover key operational areas of the site.
Minor changes to internal infrastructure and operational layout: • Provision of new push walls adjacent to the tipping Shed B • Extension of internal tipping floor • Demarcation of an internal unloading floor and visual inspection area • New concrete wall • New internal dangerous goods storage area • Internal signage	Design progression	Design progression since the EIS has resulted in several minor changes to internal infrastructure designed to maximise operational efficiency and ensure the safety of staff and visitors. The expanded shed and provision of new push walls in the south-eastern corner of the proposed extension would substantially increase the tipping floor area improving the efficiency of the site and ability to process the proposed throughput. Increase shed size and adjustments to the push walls would also allow for provision of a demarcated visual inspection area, which would enable efficient and effective inspection of waste and identification of non-conforming waste.
Removal of the existing above-ground wheel wash and installation of a new 20 m long weighbridge and in-ground wheel wash at the vehicle egress point	Design progression	To increase operational efficiency and site safety and prevent queueing on to Pembury Road, vehicle movements within the site would be changed to one way only. Vehicles enter through the eastern driveway and exit through the western driveway. To facilitate this movement the existing above ground wheel wash adjacent to the gatehouse would be removed and a new inground wheel wash and weighbridge would be installed to the east of Shed A before vehicles exit the site.

Amendment to the Proposal	Amendment driver	Justification
		A number of submissions raised concerns around the tracking of mud from vehicles existing on to Pembury Road. In addition to facilitating one way vehicle circulation the provision of an inground wheel wash would more effectively mitigate against mud being track onto Pembury Road than an above ground equivalent.
Relocation of the 30,000 L self-bunded fuel tank closer to the rear of Shed A	Design progression	To increase operational efficiency and site safety vehicle movements within the site would be changed to one way only, where vehicles enter through the eastern driveway and exit through the western driveway. To enable heavy vehicle to perform the require movements through the site, the existing fuel tank located to the south of shed A would be relocated to the northern side of shed A.

6.3 Amendments to the Proposal

The amendments to the Proposal are detailed in Section 6.3.1 to Section 6.3.6 below and shown in Figure 6-1 and Appendix B. Where changes to the construction and operational aspects of the Proposal are anticipated as a result of the amendments to the Proposal, further environmental assessment has been undertaken, as detailed in Section 7 of this RtS.



DEWCAPE
DISTINCTION IN BUILDING

BINGO INDUSTRIES

No.	Description	Date
B13	ISSUED FOR INFORMATION	20/09/2017
B14	FINAL ISSUE	03/11/2017
B15	FINAL ISSUE	09/11/2017
B16	FINAL ISSUE	27/11/2017
B17	FINAL ISSUE	01/02/2018
B18	FINAL ISSUE	05/03/2018

LEGEND
BUILDINGS
SUBSTATION
LANDSCAPE AREA

SITE AREA:	6957 m2
SHED A:	927.7 m2
SHED B:	1120 m2
SHED C:	961.8 m2
SITE OFFICE:	16.8 m2
LUNCH ROOM:	36.8 m2
AMENITIES:	23.6 m2
ENCLOSED YARD:	3525 m2

CLIENT: BINGO
PROJECT: 13 PEMBURY ROAD MINTO
SHEET NAME: GROUND FLOOR PLAN
Project number: M1004
Date: 20/07/17
STAGE: DEVELOPMENT
Drawn by: Author | Checked by: Checker
SHEET No: SSD01 | REVISION: B18
Scale: As indicated @ A0

Figure 6-1 Amendment Proposal layout

6.3.1 Enclosed shed and roof structure

A number of submissions received noted concerns relating to dust / air quality impacts from the Proposal, in particular the potential for greater impacts from the proposed increase in processing capacity. Since the preparation of the EIS a number of options have been investigated to further minimise dust emissions from the Proposal. It was identified that further enclosing the waste processing and handling area within the Proposal site would provide significant environmental benefits, including reductions in noise to most sensitive receivers, reduced air quality impacts and reduced visual impacts whilst also providing opportunities to increase operational efficiency.

The Amended Proposal would include the construction of a new roof over the majority of the Proposal site to provide a fully enclosed waste tipping, processing and storage area. The proposed new roof would enclose the current yard area (covering 3,525 m^2) utilised for truck inspections, manoeuvring, bin storage, truck loading and ancillary infrastructure. The proposed roof and enclosed shed would extend from the eastern boundary of the Proposal site where new colourbond cladding would be constructed above the existing concrete wall, to approximately 9.7 m above ground level from the western boundary of the site.

The proposed enclosed shed would connect the three existing sheds providing a fully enclosed facility, including enclosure of the proposed conveyor system which connects Shed A to Shed C. The southern extent of the proposed enclosed shed would extend from the southern extent of Shed B.

The northern extent of the proposed enclosed shed would extend from the southern edge of Shed A to the east, and to the west extend partially beyond (to the north) the southern edge of Shed A.

The proposed enclosed shed would have a maximum roof height of 11.84 m matching the existing maximum height of Shed B and Shed C. The ridge line of the roof would run north south, falling to a height of 7 m at the north-eastern corner of the shed and 8.8 m at the south-eastern corner of the shed. Along the western wall the enclosed shed would have a roof height of 10.11 m. The proposed shed would therefore be of the same height and scale as the existing shed structures on the Proposal site, and would be in compliance with the 12 m height limit as prescribed within the *Campbelltown Local Environment Plan 2015.*

6.3.2 Removal of minor walls and cladding

Design progression identified the need to widen existing internal vehicle routes to safely accommodate swept paths of the largest vehicles proposed to utilise the site (B-doubles). As such, the Amended Proposal would require the following alterations:

- Removal of the northern wall cladding of shed C
- Removal of 3.6 m of the northern push wall within shed C
- Removal of the wall cladding of south-western corner of Shed A.

These walls would no longer serve a structural purpose with the provision of the enclosed shed.

Amended swept path diagrams showing the Amended Proposal are included in Appendix I.

6.3.3 Adjustments to the location of the site office and increased parking provisions

As part of the submissions received on the Proposal during the public exhibition period, it was requested that additional on-site parking be provided to minimise parking impacts from staff parking on Pembury Road. The amended Proposal would include an additional seven car parking spaces (17 parking spaces in total) for staff and visitor parking. Six car parking spaces, including one disability access parking space, would be provided immediately to the west of the Proposal site access point (where three existing car spaces are currently located) as vehicles first enter the Proposal site. The spaces would be provided in a double stacking arrangement with three spaces provided in each row. The provision of an additional car parking spaces would be provided on the eastern side of the exit driveway adjacent to the proposed location for the relocated fuel tank. Further parking would also be provided in the north western corner of the site, requiring the removal of landscaping in this area.

As a result of these adjustments, the Amended Proposal would provide seven additional parking spaces across the site for a total of 17 spaces. Amended Parking locations are shown in Figure 6-1.

6.3.4 Alterations to landscaping

To accommodate for design changes as a result of the Proposal Amendments, minor alterations to landscaping would be required.

The provision of parking spaces on the western boundary of the Proposal site would require minor clearing of the existing landscaped area. Minor clearing would also be required to construct the additional car spaces provided immediately to the west of the Proposal site access point.

To compensate for changes to landscaping at the northern end of the Proposal site, landscaping and screen planting would be provided for the Proposal along the southern and western edges, where no landscaping is currently provided.

An assessment of visual impacts from alterations to landscaping is provided in Section 7 of this RtS. A description of the proposed landscaping along the southern and western edges of the Proposal site is provided in Appendix A. A landscape plan has been prepared for the Amended Proposal and is provided in Appendix C.

6.3.5 Extension of the dust suppression and sprinkler system

As a result of the new roof structure, dust suppression and sprinkler systems would need to be extended to ensure they continue to operate effectively and cover key operational areas of the site.

6.3.6 Minor changes to internal infrastructure and operational layout

Several amendments to internal infrastructure design have been made to maximise operational efficiency and ensure the safety of staff and visitors, including:

- New concrete push walls would be constructed in the south-eastern corner of the proposed enclosed shed to provide additional waste tipping floor area extending from Shed B. This area would also provide additional space for a demarcated unloading and visual inspection area. The total area available for tipping and inspecting of waste would therefore be increased from 630 m^2 to 1,120 m^2.

- An internal dangerous goods storage area would be provided adjacent to the proposed new push wall within the south-eastern portion of the enclosed shed.
- A new wall would be constructed adjacent to the second in-bound weighbridge to provide safety and protection measures to separate truck loading activities and machinery from trucks entering the enclosed shed.

6.3.7 Removal of the existing above-ground wheel wash and installation of a new weighbridge and in-ground wheel

It was identified during design progression that an increase to site throughput facilitated the need for adjustments to vehicle flows through the site to increase efficiency. To enable one way movements through the site a new wheel wash and 20 metre long weigh bridge would be constructed to the west of shed A to allowing vehicles to exit through the western driveway.

As vehicles would no longer exit via the eastern driveway a wheel wash on the eastern side of shed A would no longer be required and would be removed to further optimise traffic flows on the site.

6.3.8 Relocation of existing fuel tank

To increase operational efficiency and site safety vehicle movements within the site would be changed to one way only, where vehicles enter through the eastern driveway and exit through the western driveway. To enable heavy vehicles to perform the required movements through the site, the existing fuel tank located to the south of shed A would be relocated to the northern side of shed A.

6.4 Construction

A summary of the changes to the construction of the Proposal to accommodate the Proposal amendments is included below.

Where changes to the construction aspects of the Proposal are anticipated as a result of the amendments to the Proposal, further environmental assessment has been undertaken, as detailed in Section 7 of this RtS.

6.4.1 Construction program

As a result of the amendments to the Proposal the construction period would extend from six weeks to around four months. Construction of the Proposal would be undertaken in three key phases:

- **Stage 1** – Site preparation, demolition and installation of hardstand
- **Stage 2** – Construction of the enclosed processing shed, site office, amenity building and ancillary facilities
- **Stage 3** – Commissioning and demobilisation.

Operation of resource recovery activities would cease during the construction period. Details of the activities to be undertaken during each stage and an indicative construction program is provided in Appendix A (Consolidate project description).

6.4.2 Construction workforce and hours

It is anticipated that between five and 30 staff would be on site at any one time during construction.

Works would primarily be undertaken during standard construction hours:

- 7am to 6pm Monday to Friday
- 8am to 1pm Saturday
- No works on Sundays or public holidays.

6.4.3 Plant and equipment

An updated list of plant and equipment required for construction of the Amended Proposal is provided in Table 6-2.

Table 6-2 Indicative construction plant and equipment for the Amended Proposal

Equipment	Construction Stage		
	Stage 1 – Site preparation, demolition and installation of hardstand	Stage 2 – Construction of the enclosed processing shed, site office, amenities building and ancillary facilities	Stage 3 – Commissioning and demobilisation
Backhoe excavator	✓		
Bulldozer	✓		
Cherry pickers	✓	✓	
Concrete agitators (or similar)	✓	✓	
Concrete Pump	✓	✓	
Concrete saw	✓	✓	
Excavators	✓		
Mobile crane		✓	
Static and vibratory rollers, and high energy impact compaction			
Scraper open-bowl	✓		
Water truck			
Forklift		✓	

6.4.4 Construction traffic movements

Construction of Proposal Amendments would result in an increase in construction vehicle movements. Construction traffic numbers as outlined in the EIS would be on average around 8 daily two-way truck movements (4 trucks). As a result of proposal amendments and design progression construction traffic numbers have been updated. Daily vehicle movements for the Amended Proposal have been outlined in Table 6-3.

Table 6-3 Average and peak daily construction traffic movements

Vehicle Type	Estimated maximum daily movements (average throughout construction period)	Estimated daily movements (peak during construction period)
Light vehicles	45	90
Heavy vehicles	8	16

6.4.5 Construction ancillary facilities

A temporary site office, with lunchroom and amenities would be utilised for construction works under the Amended Proposal.

6.5 Operation

A summary of the potential changes to the operational aspects of the Proposal to accommodate the amendments to the Proposal is included below. Where changes to the operational aspects of the Proposal are anticipated as a result of the amendments to the Proposal, further environmental assessment has been undertaken, as detailed in Section 7 of this RtS.

6.5.1 Traffic flows

To facilitate increased throughput at the Proposal site traffic flows through the site would be altered to be one way only in an east to west direction. This would enable increased site efficiency and safety. An assessment of traffic impacts from the Proposal is provided in Section 7 of the RtS.

6.5.2 Vehicle stacking

In addition to alterations to internal traffic flows, current vehicle stacking arrangements would be modified to suit the amended site layout and ensure vehicles do not queue on Pembury Road. During operation, a total of 21 stacking spaces would be provided within the Proposal site.

A consolidated Amended Proposal description including amendments to the Proposal as described in this section is presented in Appendix A.

7 FURTHER ASSESSMENT

This section of the report assesses the potential environmental impacts associated with items included in the Amended Proposal. The assessment is based on the description of the modifications included in the Amended Proposal provided in Section 6 of this RtS.

For each environmental aspect, outcomes arising from the environmental assessment undertaken to support the EIS and the impacts associated with the Amended Proposal are discussed.

7.1 Visual impact and built form

7.1.1 EIS assessment

An assessment of visual impacts of the Proposal has included in Section 6.2 of the EIS and is summarised below.

Existing landscaping in the form of shrubs (approx. 2 metres tall) along the northern boundary of the site provides screening of the storage shed from the street.

The height of the structures as proposed within the EIS, including the electrical substation, offices and amenities are much lower than the existing sheds. In this regard, there would be no discernible change to the height and scale of the Proposal site arising from the Proposal. The Proposal would be consistent with the established built form and visual character of the area.

7.1.2 Impact assessment – Amended Proposal

Construction

A summary of the key findings of further visual impact assessment, from a construction perspective, are provided in Table 7-1.

Table 7-1: Construction visual impact assessment for the Amended Proposal

Item	Assessment
Enclosed processing shed	Construction of the enclosed processing shed would largely be conducted on the eastern side of the site and would be visually shielded from adjacent businesses by existing site infrastructure such as sheds, walls, boundary fences and landscaping. Some construction activities and equipment, such as the use of cranes and telehandlers, may extend above existing site sheds. Given the industrial setting of the Proposal site and the short term nature of works a significant impact on the visual landscape is not anticipated.
Removal of minor walls and cladding	Minor walls and cladding to be removed for the Amended Proposal are located on the northern side of shed C and the south western corner of Shed A. These activities are located within the facility and would be shielded for view by the existing sheds walls, boundary fences and landscaping. As such these activities would not result in a significant visual impact.
Adjustments to the location of the site office and increased parking provisions	A change in the location of the proposed site offices at the northern end of the Proposal site would not significantly alter the construction activities required for the Proposal and therefore would not substantially change the assessment of construction stage visual impacts as presented in the EIS.

Item	Assessment
Alterations to landscaping	Additional landscaping would be provided along the southern and western boundaries of the Proposal site as shown in Figure 6-1.. Construction activities for the provision of additional landscaped areas within the Proposal site would be short term, temporary, and shielded by existing site infrastructure and would not result in a significant impact on the visual landscape.
Extension of the dust suppression and sprinkler system	Extension of the dust suppression and sprinkler system would occur within and adjacent to the newly enclosed processing shed. Works would involve installation of piping and sprinkler heads and would be short term. As such, these works would be screened from surrounding receivers and would not result in a visual impact.
Minor changes to internal infrastructure	Changes to internal infrastructure would occur within the newly enclosed processing shed (once completed). As such, these works would be screened from surrounding receivers and would not result in a visual impact.

Operation

Amendments to the Proposal would not significantly change operational activities and the associated visual impacts on the Proposal site, as detailed in the EIS. Enclosing the site would shield adjoining businesses visually from the majority of day to day operations such as processing and handling of waste and on-site vehicle movements. Additionally, the new processing and handling shed would be constructed using high quality materials and would be consistent the visual landscape of the surrounding industrial area.

No further assessment of operational stage visual impacts is considered necessary in relation to the amendments to the Proposal.

7.1.3 Mitigation measures

Construction

This assessment concludes that the amendments to the Proposal would result in construction phase visual amenity impacts generally consistent with those already identified and assessed as part of the EIS. No additional construction visual amenity-related mitigation measures are proposed as a result of the amendments to the Proposal.

Operation

This assessment concludes that the amendments to the Proposal would result in operational phase visual amenity, urban design and landscape character impacts generally consistent with those already identified and assessed in the EIS. No additional operational visual amenity-related mitigation measures are proposed as a result of the amendments to the Proposal.

7.2 Noise and vibration

7.2.1 EIS assessment

An assessment of noise and vibration impacts from the Proposal has been undertaken which is included in Section 6.3 and Appendix L of the EIS and is summarised below.

The surrounding area is characterised by a mix of industrial development. The NIA identifies a total of five industrial receivers, six community receivers and 17 residential receivers in the surrounding area which have the potential to be affected by the proposed works. The background noise environment has been characterised by unattended noise monitoring utilising calibrated noise loggers and attended noise monitoring utilising calibrated sound level metres.

During construction noise levels are not predicted to trigger the Noise Management Levels (NML) for residential premises at the nearest residential receivers and other land uses. The CNMP for the Proposal includes a monitoring program to assist in maintaining compliance while including management protocols to mitigate impacts and provide a framework for dealing with identified exceedances if this is to occur.

The operational noise impact assessment indicates compliance with project specific noise criteria in accordance with the INP at all receivers during the daytime, evening, night time (morning shoulder) periods. Noise generating activities associated with the proposed operations are therefore considered to have an insignificant impact on the existing noise environment.

The maximum morning shoulder and daytime increases in total traffic flows, due to the Project related vehicles would result in less than a 2 dBA increase in the existing traffic noise levels. Specifically, the traffic noise levels would increase by 0.6 dBA and 0.2 dBA during the daytime and night-time periods, respectively. The noise increase of up to 2 dB represents a minor impact that is considered barely perceptible to the average person.

7.2.2 Impact assessment – Amended Proposal

Sensitive receivers

The EIS assessment identified 17 residential receivers, five industrial receptors and six community receptors as the most potentially affected by noise from the Proposal. These receivers are shown in Figure 7-1.

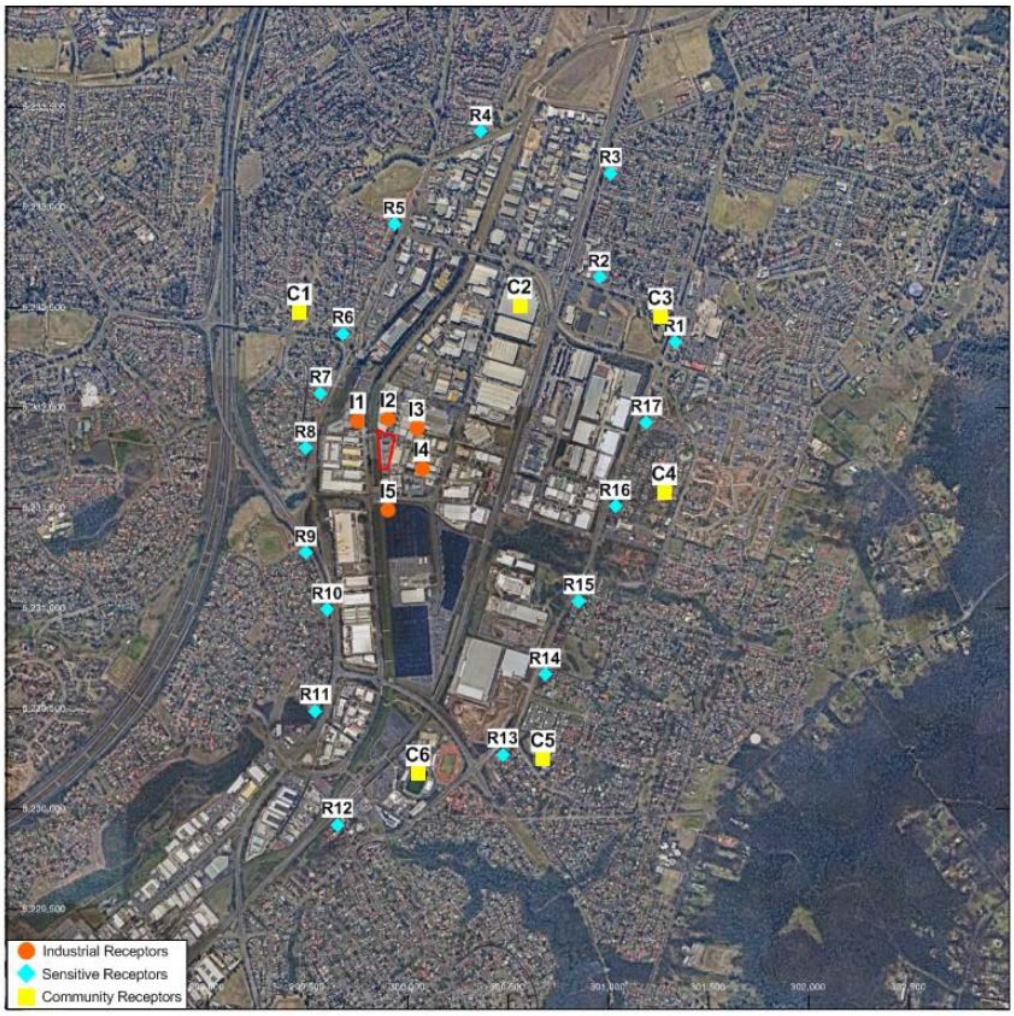


Figure 7-1 Noise sensitive receptors in the vicinity of the Proposal site

Noise and vibration criteria

The Project Specific Noise and Vibration Criteria for the proposed Minto Resource Recovery Facility has been outlined in the Noise and Vibration Impact Assessment included as Appendix L of the EIS and will remain unchanged for the Amended Proposal.

Construction sound power levels

The comparison of the original and revised construction plants for the proposed Minto Resource Recovery Facility is presented in Table 7-2 below. The sound power level for each individual construction plant and the combined sound power level for each construction scenario are also presented in Table 7-2.

Table 7-2 Construction scenarios and equipment sound power levels comparison

Scenario	Plant/equipment item	Number of items per 15 minute period		Maximum sound power level (L_{Aeq})		
				Individual item	**Maximum for scenario[1]**	
		EIS Proposal	**Amended Proposal**		**EIS Proposal**	**Amended Proposal**
S1 General Construction	Elevated Working Platform	1	1	97	118	118
	Hand Tools	1	1	96		
	Grinder	1	1	98		
	Circular Saw	1	1	104		
	Truck (10 tonne)	1	1	98		
	Dozer	1	1	110		
	Bobcat	1	1	104		
	Excavator (20 tonne)	1	1	99		
	Front End Loader (FEL) 962	2	2	112		
	Tipper Truck	4	4	97		
	Franna Crane	2	2	99		
	Concrete Truck / Agitator	1	1	106		
	Water Tanker (8000 litre)	2	2	98		
	Boom Lift	-	2	92		
	Scissor Lift	-	2	92		
S2 Noise Intensive Works	Excavator (Breaker)[2]	1	1	121	121	121

Note 1: Maximum activity assumes all plant and equipment per scenario operating concurrently.
Note 2: Denotes “annoying” items of equipment as defined in the ICNG, and as such includes a +5dB penalty to the predictions.

Construction noise levels

Additional Boom Lifts and Scissor Lifts would be required for the construction scenarios compared with the EIS Proposal. However, the predicted overall construction noise levels at the surrounding noise affected receivers remain unchanged. The predicted

construction noise levels would not trigger the daytime NML at any of the modelled sensitive receptors.

A full comparison of EIS and Amended Proposal construction noise impacts at each of the surrounding receptors is presented in Appendix G of this RtS (Amended Noise and Vibration Assessment).

Operational noise

Operational noise scenarios would remain the same as those presented in the EIS, being:

- Monday to Saturday - 6:00am to 10:00pm
- Sunday and Public Holidays - No operations

The operational scenarios have been incorporated into the noise model including amendments to the Proposal. The predicted noise levels from the proposed operation would comply with the project specific noise criteria at all residential receivers and other land uses.

The model indicates that the operational noise levels would be reduced (when compared to those presented in the EIS) at most of the assessment locations due to the enclosure of the site. Minor noise increase are anticipated at six receptor locations due to the noise from the openings at the entry and exit of the enclosed shed. However, these increases would be minor and would continue to comply with the project specific noise criteria.

A full comparison of the EIS and Amended Proposal operational noise impacts at each of the surrounding receptors is presented in Appendix G of this RtS (Amended Noise and Vibration Assessment).

Off-site traffic noise

An assessment of off-site traffic noise has been conducted in accordance with the NSW Road Noise Policy (RNP) and is included as part of the Amended AQIA (Appendix H of this RtS). The assessment was undertaken on sub-arterial roads identified as vehicle routes for the Amended Proposal, that feature potentially affected sensitive receivers, being Campbelltown Road and Pembroke Road.

The predicted traffic noise levels for the existing environment and with the addition of traffic from the Amended Proposal were developed in accordance with Calculation of Road Traffic Noise (CORTN) methodology.

Predicted traffic noise levels for the existing environment at the most noise affected receivers along Campbelltown and Pembroke Road exceeds the NSW RNP criteria of 60 dBA $L_{Aeq(15hour)}$ and 55 dBA $L_{Aeq(9hour)}$. As such, the NSW RNP 2 dBA ‘allowance’ criterion applies for the amended Proposal.

The assessment shows that the addition of vehicles from the Amended Proposal along Campbelltown Road and Pembroke Road would increase total traffic flows by a maximum 0.2% and 0.1% respectively. This would result in less than a 0.2 dBA increase in the traffic noise levels at the most affected receptors. According to EPA’s Road Noise Policy, a noise increase of up to 2 dBA represents a minor impact that is considered barely perceptible to the average person. As such, off-site traffic noise from the Amended Proposal is not anticipated to have a noticeable impact on sensitive receptors.

Operational vibration

The Amended Proposal would not change the existing operational plant at the Proposal site. Plant would continue to be maintained and monitored on an ongoing basis. Vibration impacts from amendments to the proposal are not anticipated.

7.2.3 Mitigation measures

No additional construction or operational noise and vibration mitigation measures are required as a result of amendments to the Proposal.

7.3 Air Quality, odour, and climate change

7.3.1 EIS assessment

An assessment of air quality, odour, and climate change impacts from the Proposal has been undertaken which is included in Section 6.4 and Appendix M of the EIS and is summarised below.

During operation modelling results of predicted concentrations for each pollutant at sensitive receptors indicated:

- Maximum 24-hour average cumulative (i.e. including background) $PM_{2.5}$ concentrations predicted at surrounding sensitive receptor locations are below the relevant ambient air quality criterion of 25 µg/m³.
- Annual average cumulative $PM_{2.5}$ concentrations predicted as a result of the proposed operation at surrounding sensitive receptor locations are also very low and well below the relevant ambient air quality criterion of 8 µg/m³.
- Maximum 24-hour average cumulative PM_{10} concentrations predicted at surrounding sensitive receptor locations are below the relevant ambient air quality criterion of 50 µg/m³.
- Annual average cumulative PM_{10} concentrations predicted as a result of the proposed operation are very low at all locations downwind and well below the relevant ambient air quality criterion of 25 µg/m³.
- Annual average cumulative dust deposition level predicted as a result of the proposed operation are also very low at all locations downwind and well below the relevant ambient air quality criterion of 4 g/m²/month.

The cumulative annual average PM_{10} concentrations predicted at the industrial receptor locations comply with the relevant ambient air quality criterion of 25 µg/m³.

The results also show that the maximum predicted cumulative 24-hour average PM_{10} concentrations comply with the ambient air quality criterion at all residential and industrial receptor locations.

7.3.2 Impact assessment – Amended Proposal

Given the minor nature of construction works as presented within the EIS and minor nature of anticipated impacts, a construction phase air quality assessment was not presented. As a result of amendments to the Proposal and in response to submissions, an assessment of air quality impacts from construction of the Amended Proposal been completed and is summarised below.

Construction

For the assessment of construction phase of the Amended Proposal, the IAQM Guidance on the Assessment of Dust from Demolition and Construction developed in the United Kingdom by the Institute of Air Quality Management (IAQM 2014) has been used to provide a qualitative assessment method (see Appendix H for a full methodology).

The IAQM method uses a four-step process for assessing dust impacts from construction activities:

- Step 1: Screening based on distance to the nearest sensitive receptor; whereby the sensitivity to dust deposition and human health impacts of the identified sensitive receptors is determined.
- Step 2: Assess risk of dust effects from activities based on:
  a. the scale and nature of the works, which determines the potential dust emission magnitude; and
  b. the sensitivity of the area surrounding dust-generating activities.
- Step 3: Determine site-specific mitigation for remaining activities with greater than negligible effects.
- Step 4: Assess significance of remaining activities after management measures have been considered (included in Section 7.3.3 below).

Step 1 - Screening Based on Separation Distance

The nearest existing residential receptors have been identified as being located approximately 340 m west of the Proposal site. As the receptor is located within 350 m from the boundary of the Proposal site, further assessment is required.

Step 2a - Assessment of Scale and Nature of the Works

Based on the available information and the IAQM definitions presented in Appendix H, the dust emission magnitudes are presented in Table 7-3.

Table 7-3 Categorisation of dust emissions magnitude

Activity	Dust Emission Magnitude	Basis
Demolition	Small	Total building volume <20,000 m^3, demolition activities <10m above ground, potentially dusty construction material
Construction	Medium	Total building volume 25,000 m^3 to 100,000 m^3
Track-out	Medium	Between 10 and 50 heavy vehicle movements per day, surface material with low potential for dust release, unpaved road length <50 m

Step 2b - Risk Assessment

The sensitivity of the identified receptors in this study is concluded to be high for health impacts and high for dust soiling, as they include residential areas where people may be reasonably expected to be present continuously as part of the normal pattern of land use.

The sensitivity of the area to dust soiling is classified as low and the sensitivity of the surrounding area to health effects has been classified as 'low'. This categorisation has been made taking into account the individual receptor sensitivities derived above, the annual mean background PM10 concentration of 17.0 µg/m3 (i.e. <20 µg/m3), identified for the Proposal site in the previous AQIA (SLR 2017) and the anticipated number of receptors present within 350 m of the Project Site boundary.

Given the sensitivity of the general area is classified as 'low' for dust soiling and 'low' for health effects, and the dust emission magnitudes for the various construction activities is shown in Table 7-3, the resulting risk of air quality impacts is presented in Table 7-4.

The results indicate that there is a low risk of adverse dust soiling and human health impacts occurring at the off-site receptor locations, even if no mitigation measures were to be applied to control emissions from demolition, construction and track-out.

Table 7-4 Risk of air quality impacts from construction activities (uncontrolled)

Impact	Sensitivity of the area	Dust emission magnitude			Preliminary Risk		
		Demolition	Construction	Track-out	Demolition	Construction	Track-out
Dust Soiling	Low	Small	Medium	Medium	Negligible	Low	Low
Human Health	Low	Small	Medium	Medium	Negligible	Low	Low

Operation

As outlined in the EIS, the key atmospheric pollutants likely to be generated by operational activities are fugitive emissions of particulate matter. The key emission sources and major pollutants identified at the Amended Proposal site are as follows:

- Particulate emissions from loading/unloading of waste material
- Particulate emissions from waste material handling/sorting/processing activities
- Particulate emissions from on-site vehicle movements

The predicted impacts presented in this report are based on using an identical modelling methodology and the same meteorological dataset as that used in preparing the AQIA for the EIS (SLR 2017). As noted within the EIS, the modelled dust emissions from the Proposal site were estimated based on the daily maximum throughput, assuming that the Proposal site would operate at the maximum daily capacity every day of the year. As such, the assessment is considered to be conservative and the impacts presented are 'worst case scenario' and actual impacts are likely to be less than those identified.

Sensitive receptors utilised in the assessment are the same as those identified within the EIS, being 17 residential receivers, five industrial receptors and six community receptors. These receivers are shown in Figure 7-1

A summary of the outcomes of the air quality impact assessment for the Amended Proposal is provided below. A detailed description of the results of the assessment is provided in Appendix XI.

Total Suspended Particulate (TSP) and Dust Deposition Rates

The modelling results show that the incremental annual average TSP concentrations and dust deposition rates predicted at all surrounding sensitive receptors are negligible.

Annual average incremental TSP concentrations and dust deposition rates predicted at all residential and community receptors is less than 0.1 µg/m³.

The criteria for cumulative annual average TSP concentrations and dust deposition levels have been identified as 90 µg/m³ and 4 g/m²/month respectively. The cumulative levels predicted at all residential and community receptors would be below criteria being <34.1 µg/m³ for TSP and <2 g/m²/month for dust deposition.

The predicted incremental and cumulative TSP and dust deposition levels for residential and community receptors is consistent with those presented in the EIS.

As shown in Table 7-5 annual average incremental TSP concentrations and dust deposition levels predicted at industrial receptors are generally consistent with the EIS. Changes as a result of Amendments to the proposal are considered negligible. The predicted incremental and cumulative TSP and dust deposition levels for industrial receptors are well below the relevant assessment criteria.

Table 7-5 Annual average TSP concentrations and dust deposition rates predicted at industrial receptor locations

Receptor ID	TSP (µg/m³)			Dust Deposition (g/m²/month)		
	Increment	**Cumulative**	**Change from EIS**	**Increment**	**Cumulative**	**Change from EIS**
I1	0.4	34.4	0	<0.1	<2.1	0
I2	0.8	34.8	0	<0.1	<2.1	0
I3	0.9	34.9	- 0.2	<0.1	<2.1	0
I4	0.4	34.4	- 0.1	<0.1	<2.1	0
I5	0.5	34.5	0.1	<0.1	<2.1	0
Criteria	**-**	**90.0**	**-**	**2.0**	**4.0**	**-**

Particulate Matter < 10 µg/m³ (PM_{10})

The modelling results indicate that the incremental annual average PM_{10} concentration attributable to emissions from the Proposal site is negligible being <0.1 µg/m³ at all surrounding residential and community receptors and <0.2 µg/m³ at industrial receptors.

The cumulative annual average PM_{10} concentrations predicted at all surrounding sensitive receptor locations comply with the relevant ambient air quality criterion of 25 µg/m³. The cumulative 24-hour average PM_{10} concentrations predicted by the modelling at all surrounding sensitive receptors comply with the relevant criterion of 50 µg/m³.

The off-site PM_{10} concentrations predicted at sensitive receptor locations for the Amended Proposal are relatively lower than those predicted in the EIS.

Particulate Matter < 2.5 µg/m³ ($PM_{2.5}$)

The modelling results indicate that incremental annual average $PM_{2.5}$ concentrations predicted as a result of emissions from the Amended Proposal are negligible (<0.1

µg/m³) at all surrounding receptor locations. The cumulative annual average $PM_{2.5}$ concentrations predicted at all surrounding receptor locations comply with the relevant ambient air quality criterion of 8 µg/m³.

The cumulative 24-hour average PM2.5 concentrations predicted at all surrounding industrial and residential receptors for the Amended Proposal comply with the relevant criterion of 25 µg/m3.

The off-site $PM_{2.5}$ concentrations predicted at sensitive receptor locations for the Amended Proposal are relatively lower than those predicted in the EIS.

7.3.3 Greenhouse gas

The Amended Proposal would have minor additional GHG sources including:

- Construction-phase emissions
- Increased operational energy consumption within the shed enclosure.

The construction phase would be of short duration and would include minor construction activities only. GHG emissions associated with the proposed construction activities are therefore considered to be negligible.

The results of the GHG Assessment presented in the EIS found the emissions generated as a result of electricity consumption within the operational phase GHG emissions use would be 105 tCO2-e/annum only. This is considered to be an insignificant contribution to state and national GHG emission inventories. A minor increase in energy use at the facility would result in a minor increase in the annual GHG emission. However, predicted levels would still be considered negligible.

7.3.4 Mitigation measures

Construction

The following mitigation measures will be implemented during the construction phase of the Amended Proposal. These measures are additional to those proposed in the previous EIS as a result of the change in construction activities and impacts.

Mitigation measures to manage air quality will be included in the CEMP prepared for the Amended Proposal, and will comprise the following:

- Where practicable, the disturbance footprint will be limited and unnecessary surface disturbance will be avoided.
- Where practicable, dust-generating construction activities will be restricted during hot, dry and windy weather conditions.
- Where practicable, materials and structures will be dampened using water sprays prior to demolition and unsealed surfaces will be watered.
- Construction machinery and vehicles will be maintained and serviced according to the manufacturer's specifications, and engines will be switched off when not in use.
- Construction-related vehicle movements will be limited to a speed limit of 5 km/h.
- Vehicles removing earth or other dust generating material from the Proposal site will have their loads covered.
- Regular visual checks of excessive dust within the Proposal site will be undertaken and used to implement additional controls where required.

Operation

Additional air quality controls have been incorporated into the Amended Proposal design, including:

- Enclosing site sorting and handling activities within a site shed
- The provision of an inground wheel wash facility for all outgoing vehicles
- The provision of a CoolMist system within the enclosed shed.
- Upgrades to external dust suppression and sprinkler systems.

Given the negligible nature of air quality impacts from the Amended Proposal, additional measures are not proposed.

7.4 Hazards assessment

7.4.1 EIS assessment

An assessment of potential hazards from the Proposal is included in Section 6.5 of the EIS and is summarised below. A preliminary risk screening assessment of the proposed storage quantities and delivery frequencies of dangerous goods proposed to be used on site was undertaken by SLR Consulting and is included as Appendix K of the EIS.

The assessment identified diesel as the only dangerous good that would be stored on site. Diesel is a class C1 combustible liquid and, as described in Applying SEPP 33, is not considered to be potentially hazardous when stored in a separate bund or within a storage area where it is the only combustible liquid present. The diesel storage tank area and bund is designed and constructed to satisfy the requirements of *AS1940-2004 - The storage and handling of flammable and combustible liquids.* This standard contains the minimum acceptable safety requirements for storage facilities, operating procedures, emergency planning and fire protection. As such, storage of Diesel on site is not considered to be potentially hazardous. For the purposes of transport, diesel is not classified as a dangerous good.

7.4.2 Impact assessment – Amended Proposal

Construction

Amendments to the Proposal would not significantly alter the construction activities required for the Proposal and, therefore, would not change the assessment of construction stage hazards and risks included in the EIS.

Operation

Amendments to the Proposal would not significantly alter the operational activities for the Proposal and therefore would not change the assessment of operational stage hazards and risks included in the EIS.

The Proposal site will not accept dangerous goods. However, from time to time unexpected finds of materials such as asbestos, tyres, batteries, gas bottles, fire extinguishers and food may be encountered. These materials would be handled in accordance with a project specific Operational Environmental Management Plan (OEMP) procedures and appropriately stored for efficient disposal.

A separated area for storage of unexpected finds and materials, and dangerous goods would be demarcated within the south-eastern portion of the enclosed processing shed;

incorporating an asbestos bin area, battery storage cage, fire extinguisher cage and gas bottle storage cage.

Dangerous goods stored on site would continue to be below screening thresholds and therefore are not considered to be potentially hazardous. As such additional screening in accordance with SEPP 33 would not be required.

7.4.3 Mitigation measures

Construction

This assessment concludes that the hazards and risks associated with the construction of the amended Proposal would generally be consistent with those already identified and assessed as part of the EIS. No additional mitigation measures relating to hazards and risk are proposed as a result of the amendments to the Proposal.

Operation

Unexpected finds containing hazardous / dangerous goods would be handled and managed in accordance with the OEMP for the site. No additional mitigation measures related hazards and risk for the operational phase of the Amended Proposal are required.

7.5 Waste, soils and water

7.5.1 EIS assessment

Waste

An assessment of waste to be generated and disposed of during construction and operation for the Proposal was undertaken by Dewcape Pty Ltd and was included in Section 6.6 of the EIS. A Construction Waste Management Plan was prepared which identified construction waste to comprise materials typically associated with minor demolition and construction works.

A final Operations Environmental Management Plan (OEMP) would be adopted to oversee the day to day site operations. The OEMP would be reviewed and amended at least annually. It is expected that the revised OEMP would incorporate any additional measures relating to waste handling and management resulting from the assessment of this application.

Soils and water

An assessment of soil and water impacts was included in Section 6.6.3 of the EIS. A soil and water management plan for the Proposal was provided as Appendix I of the EIS.

The soil and water assessment in the EIS indicates that the Project and associated current and proposed management measures will adequately control soil and water impacts.

It is considered that the proposed control measures to be implemented onsite will adequately manage pollutant loading to the stormwater drainage network in relation to the key pollutants of concern including gross pollutants, coarse sediment, suspended solids and free oils.

Given the size of the Site in the context of the catchment, any elevated stormwater pollutant load discharges are unlikely to pose a significant impact to the health of ecosystems within the Georges River Catchment and other downstream waterways.

7.5.2 Impact assessment – Amended Proposal

Construction

Construction of the Amended Proposal would result in the generation of waste streams and quantities generally consistent with those identified in Appendix P of the EIS (Construction Waste Management Plant).

Soil and water impacts associated with the construction of the Amended Proposal would generally be consistent with those identified in the EIS.

Operation

Waste generation and management during operation of the Amended Proposal would be generally consistent with that described within the EIS. Operational waste management would be undertaken in accordance with the Operational Environmental Management Plan (OEMP) as detailed within the EIS.

Water quantity

Any increase in peak flow rates and runoff volumes from the Amended Proposal are anticipated to be negligible since the increase in impervious area associated with the additional car parks is very small. The provision of an enclosed shed would not significantly change flow rates or volumes as it would be covering and area which has a similarly impervious nature (concrete slab). A small amount of additional storage capacity will be created within the proposed stormwater pit/pipe network and runoff.

Water quality

The Amended Proposal would comprise an extension to the existing dust suppression and sprinkler system to accommodate for the new enclosed shed and ensure they continue to operate effectively and cover key operational areas of the site. The “Coolmist” fogging system is designed to produce a fine mist within the shed which would not produce runoff. The yard sprinklers would only be used for dust suppression purposes to make the ground damp but not wet enough to produce surface water runoff and thus would also not contribute to runoff volumes. As such, extensions to these systems is not anticipated to result in additional impacts to soil and water above those identified in the EIS.

Minor adjustments to the existing stormwater system would be made as part of the Amended Proposal to accommodate new infrastructure and ensure the site continues to meet quality targets. Water within the Amened Proposal site would be capture/conveyed through one of several systems.

Water captured within the processing shed would be treated as leachate. Proposal buildings have been designed to exclude stormwater flows and the grading and drainage of internal hardstand areas within sheds has been designed to contain any leachate. Bunds would be constructed at the shed openings to provide separation of leachate and stormwater. Water within the processing shed would drain to a blind sump within the processing area. Existing pits as indicated on the stormwater design, would be completely sealed to prevent water entering the pits. Leachate collected within the blind sump would be pumped out and trucked for disposal at an appropriately licensed facility.

Roof water from the existing sheds would continue to be managed by the existing stormwater system. This water is currently directed into an underground 100 kL rainwater tank for re-use at the site. This rainwater tank is used to reduce the demand for potable water by re-use for external hose cocks and landscape water systems. The MUSIC model developed for the EIS and updated for the Amended Proposal included an assessment of water quantity requirements at the site. The model identified that 99% of the non-potable demand for the Amended Proposal (other than for dust suppression) would met by rainwater reuse. Captured untreated rainwater would not be used for the dust suppression system as it would not meet the water quality specifications for misters and may result in blockages.

Supply in excess of the capacity of the re-use tank would be directed to a proprietary stormwater treatment device (Stormwater 360 Filter Chamber) before discharging offsite into the Campbelltown City Council (CCC) stormwater system which flows into Bow Bowing Creek adjacent to the site.

Roof water from the new roof to be constructed as part of the Amended Proposal would be directed to the Stormwater 360 Filter Chamber for treatment prior to discharge offsite into the CCC stormwater system.

Water collected from external hardstand areas would be conveyed by the upgraded pit/pipe network (see Appendix D of this RtS). In addition to the pit/pipe stormwater system, bunding also exists on either side of the site to ensure that runoff is contained on-site and directed to the stormwater treatment system. Existing stormwater pits are fitted with EnviroPod Gross Pollutant Traps (GPTs) to provide primary treatment of the site runoff prior to the downstream StormFilter stormwater treatment system.

As all stockpiles would be contained within the enclosed shed (which would be captured by the leachate system described above) the increase in proposed throughput would not result in a change to water quality outcomes as identified in the EIS. The changes to runoff from the increase in roof water from the new shed have been accommodated for by the provision of two additional filters within the Stormwater 360 Filter Chamber. An updated MUSIC model has been developed to assess changes to water quality from Amendments to the Proposal and the results are presented Table 7-6.

Table 7-6 Predicted water quality outcomes from the Amended Proposal

Pollutant	Target %	Proposed Development		
		Predicted Reduction in pollutant load %	**Target achieved**	**Predicted Mean Annual Discharge Loads (kg/yr)**
Gross pollutants	N/A	94.2	Yes	10.6
TSS	80	87.6	Yes	65
TP	45	64.7	Yes	0.53
TN	45	45	Yes	8.3

As identified above the proposed treatment system will meet Council's objectives for gross pollutants, TSS, TP and TN for the proposed development. As such, the Amended Proposal is not anticipated to result in additional impacts to water quality above those identified in the EIS.

7.5.3 Mitigation measures

Construction

This assessment concludes that the construction waste, soil and water impacts from the Amended Proposal would generally be consistent with those already identified and assessed as part of the EIS. No additional mitigation measures relating to construction waste management are proposed as a result of the amendments to the Proposal.

Operation

This assessment concludes that the operational waste, soil and water impacts from the Amended Proposal would generally be consistent with those already identified and assessed as part of the EIS. No additional mitigation measures relating to management of operational management are proposed as a result of the amendments to the Proposal.

7.6 Contamination

7.6.1 EIS assessment

An assessment of potential contamination impacts from the Proposal is included in Section 6.7 of the EIS and is summarised below. A Phase 1' Contaminated Land Investigation has been prepared by SLR Consulting and is included as Appendix J of the EIS.

The phase 1 assessment indicates that the subject site is suitable for continued use for industrial purposes. However, additional investigations in the form of soil sampling be undertaken in areas where future soil disturbance is proposed. During construction, the existing site levels will be retained and any ground disturbance will be minimal and limited to excavation for footings only. It is unlikely that groundwater will be affected at the depths proposed for footings. There is negligible risk of coming into contact with groundwater from activities associated with construction of footings as the new structures are demountable and do not require significant excavation.

An updated Construction Waste Management Plan (CWMP) would include protocols relating to the supervision, testing and handling of groundwater in the unlikely event that it is encountered during construction works.

All operations would be conducted on sealed surfaces resulting in minimal risk of contamination impacts to soils and groundwater.

7.6.2 Impact assessment – Amended Proposal

Construction

Potential contamination impacts associated with construction of the Amended Proposal would generally be consistent with those identified in the EIS. Minor amounts of additional excavation may be required for the installation of the new in ground wheel wash and footings of the enclosed shed which may encounter existing contamination. As outlined within the mitigation measures provided in EIS a Construction Environmental Management Plan (CEMP) would be prepared and submitted to the PCA prior to the commencement of demolition works or the approval of a construction certificate under section 109C of the Act.

The CEMP would further consider the results of subsurface materials testing and would provide protocols to ensure the health and safety of construction workers when handling or working within disturbed areas. Any testing of material would be undertaken in accordance with the relevant guidelines made under the Contaminated Lands Management Act 1997. Should further approvals be required to undertake construction or remediation work, they would be sought and secured prior to the commencement of any works.

Operation

Operation of the Amended Proposal would not result in additional contamination risks / impacts above those identified in the EIS.

7.6.3 Mitigation measures

No additional mitigation measures relating to contamination are required as a result of amendments to the Proposal.

7.7 Access, Traffic and Parking

7.7.1 EIS assessment

An assessment of access, traffic and parking impacts from the Proposal has been undertaken which was included in Section 6.7 and Appendix G of the EIS and is summarised below.

Construction

The traffic assessment within the EIS predicted construction traffic generation to comprise an average of 8 daily two-way truck movements or 4 trucks. Consequently, construction traffic is not predicted to compromise the safety and function of the surrounding road network.

Operational traffic

The EIS assessment identified that the Proposal site has capacity to generate a maximum of 464 heavy vehicle movements per day (two way) which means that in the unlikely event that the site would operate to its fullest capacity, a maximum of 232 trucks would use the site. The existing facility generates approximately 88 (two way) vehicle movements per day, processing 30,000 tonnes of waste per annum. While the proposal represents an increase of 7.3 times in volume of waste processed, this would not result in a proportional increase in heavy vehicle movements. This is primarily due to the change in the type (size) of heavy vehicles predicted to transport waste to, and processed waste from, the site. The increase in capacity is predicted to result in larger heavy vehicles utilising the facility. Hence, there would be fewer vehicle movements carrying more material.

The TIA concludes that the additional traffic generated by the proposal, could not be expected to compromise the safety or function of the surrounding road network, and thus the operation of the surrounding road network would largely remain unchanged as a result of the proposal.

Also, a comparison of the existing and future intersection operating conditions shows that the impact of traffic generated by the development would not result in a significant change to the existing intersection Level of Service for the intersections of Campbelltown Road with Ben Lomond Road and Rose Payten Drive. Hence, as a

worst-case scenario, nearby intersections would operate at an acceptable level of service during both AM and PM peak periods.

Parking

The future development would have 13 to 15 full time employees on site who would be engaged in work on Monday to Saturday between the hours of 6:00am – 10:00pm. The total number of off-street parking spaces would be 17, all of which would be used for staff parking. Opportunities for car-pooling amongst staff members as well as the use of public transport when travelling to/from work would mean that the 17 car parking spaces would adequately cater for the 13 to 15 employees at the facility.

As the nature of the future facility would predominately comprise automated processes and waste sorting activities, it would be expected that visitation patterns to the facility would be infrequent. Therefore, there would not be a requirement to provide visitor parking as part of the proposal.

Based on this, a total of 17 car parking spaces would sufficiently accommodate the parking demand at the future facility while also fulfilling the objectives as set out in the DCP.

Access

The proposed internal access arrangements have been designed to cater for the largest vehicle used to enter and exit the site in a forward direction. The manoeuvring arrangements and swept path plans provided within the EIS clearly demonstrate that the proposed site layout and arrangements would successfully allow these large vehicles to enter and exit the site, via the weighbridges, in a forward direction with no reversing movement. Such movements can be undertaken without impacting on parked cars within the road reserve or crossing of the road centre line.

The EIS identified that based on typical future operations, the site has capacity to stack more vehicles than the expected volume in the worst-case scenario. Queuing of heavy vehicles will be managed within the site and are not expected to queue back onto Pembury Road.

7.7.2 Impact assessment – Amended Proposal

Construction

Construction of Proposal Amendments would result in an increase in construction vehicle movements. Construction traffic numbers as stated in the EIS were estimated to be on average around 8 daily two-way truck movements (4 trucks). As a result of proposal amendments and design progression construction traffic numbers have been updated. Daily vehicle movements for the Amended Proposal have been outlined in Table 7-7.

Table 7-7 Average and peak daily construction traffic movements

Vehicle Type	Estimated maximum daily movements (average throughout construction period)	Estimated daily movements (peak during construction period)
Light vehicles	45	90
Heavy vehicles	8	16

Operation of resource recovery activities would cease during the construction period and as such would not generate traffic. As the total number vehicles accessing the site on a daily basis would decrease during construction, the associated impacts on the surrounding road network would also decrease.

Notwithstanding this, a Construction Traffic Management Plan (CTMP) would be prepared as part of the Construction Environmental Management Plan developed for the Proposal. The CTMP would ensure that the Project maintains appropriate controls to manage traffic in and around the project during the construction works period.

Operation

A number of Amendments to the Proposal have the potential to result in changes to the scale and magnitude of operational access, traffic and parking impacts, including:

- Modifications to Shed C to permit B-double vehicles to exit via the western driveway.
- Provision of two inbound weighbridges at the eastern driveway.
- Provision of additional car parking spaces.

An updated operational traffic impact assessment has been prepared to assess the impacts from the Proposal amendments and has been summarised below (Appendix I).

A comparison of the key changes from the Proposal (as presented in the EIS) to the Amended Proposal (as described in Section 6) is provided in Table 7-8 below and further detail is provided in the following sections.

Table 7-8 Comparison of traffic features from the EIS and the Amended Proposal

Aspect	EIS Proposal	Amended Proposal
Future peak hourly site-generated traffic	61 two-way movements	54 two-way movements
Proposed off-street car parking spaces	10	17
Proposed available stacking spaces	17	21
No. of required stacking spaces during peak operation	11	8
No, of vacant stacking spaces during peak operation	6	13

Aspect	EIS Proposal	Amended Proposal
Access arrangement for waste delivery vehicles	Two separate two-way driveways	Single ingress driveway (eastern) and single egress driveway (western)
No. of stacking spaces between inbound weighbridge/s and Pembury Road	2	5 (including additional inbound weighbridge)

Surrounding road network

The Amended Proposal would result in an additional eight two-way vehicle movements (4 vehicles) during the morning road network period and five two-way vehicle movements (3 vehicles) during the afternoon road network period. An assessment of these impacts has been undertaken using SIDRA modelling software during the morning and afternoon peak periods under existing and future traffic conditions.

Overall, nearby key intersections operate at an acceptable level of service D or better under existing and future operating conditions. Therefore, the surrounding road network is expected to adequately accommodate the additional movements generated by the Amended Proposal without causing any noticeable impact.

Site access

In response to submissions received during the public exhibition period, additional assessment has been undertaken regarding site access and queueing onto Pembury Road. The Amended TIA identified that existing short-duration queues on Pembury Road are caused by operational restrictions at the primary access point to 13 Pembury Road and not by queues formed internal to the Proposal site (beyond the weighbridge).

A survey of queue lengths was undertaken to support the Amended TIA. The survey identified that most queues were short-lived, lasting less than 30 seconds. These queues were observed to occur due to:

- A vehicle ahead occupying the inbound weighbridge,
- Temporarily being stopped by the site traffic controller, and
- Giving way to a vehicle exiting the Proposal site.

The Amended Proposal would comprise two inbound weighbridges at the main driveway, and a single outbound weighbridge at the secondary driveway. This would improve operation of the Proposal site as it would increase the Site Operator's ability to accept vehicles, clearing vehicles from the driveway and avoiding the conflict of entering vehicles giving way to exiting vehicles.

Provision of two inbound weighbridges would increase the stacking capacity between Pembury Road and the inbound weighbridges. Currently, two vehicles can stack between Pembury Road and the inbound weighbridge. Provision of two inbound weighbridges would increase stacking capacity here between Pembury Road and the inbound weighbridges from two stacking spaces to five stacking spaces in total (250% increase). This would increase the stacking capacity on-site from 17 stacking spaces to 21 stacking spaces.

Based on a duration of 17 minutes, each stacking space could accommodate 3.5 vehicles in one hour (60 minutes / 17 minutes). Therefore, during any hour of operation across the day, the existing stacking arrangement could accommodate the turn-over of 74 vehicles (3.5 x 21 spaces).

At 220,000 tpa, the Amended Proposal is expected to generate a maximum of 54 two-way vehicle movements (27 vehicles) per hour. In theory, the 27 vehicles expected to

arrive during this peak hour could be accommodated across 8 stacking spaces (27 vehicles / 3.5). As a result, with 21 available stacking spaces, there would be 13 vacant.

Provision of these additional stacking spaces and the additional weighbridge, would provide sufficient capacity to eliminate queues in Pembury Road.

Parking

The Amended Proposal includes provision of 17 car parking spaces, including one accessible parking space; increased from 10 spaces previously proposed. The Amended Proposal operations would require 30 full-time staff employed at the Proposal site. Staff would operate in two shifts per day with 13 to 15 workers on-site at any given time. Given that the maximum number of personnel on-site at any one time would be 15 people, the provision of 17 car parking spaces is sufficient. No employees would be required to park on Pembury Road.

7.7.3 Mitigation measures

No additional mitigation measures relating to Access, traffic and parking are required as a result of amendments to the Proposal.

7.8 Biodiversity

Given the limited ecological values on the Proposal site an assessment of impacts to biodiversity from the Proposal was not included within the EIS. As a result of amendments to the Proposal and in response to submissions a biodiversity assessment memo has been prepared which details the potential impact from the Proposal to biodiversity. The biodiversity assessment memo is included as Appendix J and is summarised below.

7.8.1 Impact assessment – Amended Proposal

The assessment of potential biodiversity impacts was undertaken based on:

- A desktop review of existing data including OEH Mapping and a search of the NSW Bionet and Protected Matter Search Tool (undertaken on the 17th October 2017).
- A site inspection (undertaken on the 19th October 2017).

A search of the NSW Bionet database identified 18 threatened flora species and 43 threatened fauna species within 10 kilometres of the Proposal site. A search of the Protected Matters Search Tool identified a total of 27 flora species and 24 fauna species listed under the EPBC Act which are known to occur, likely to occur or may occur within 10 kilometres of the site.

The site inspection did not identify any threatened species. The northern part of the Proposal site was found to support planted vegetation along the fencelines, mostly of cultivated non-local native shrubs with some exotic species. The ground layer was predominantly composed of mulch, however there were some planted exotic ornamental species.

The vegetation along the western boundary of the Proposal site consists of scattered trees over a disturbed understorey. Trees are largely comprised non-local native species and the ground layer is dominated by exotic grasses.

The Proposal site has limited fauna habitat values. It is located in an industrial precinct and lies adjacent to a modified drainage line. It is largely devoid of vegetation with the exception of two patches at the northern end which contain planted trees and shrubs with a mulched understorey. Fruiting trees and flowering shrubs were present which

would provide foraging habitat for birds and arboreal mammals that are adapted to urban and industrial environments.

Potential impacts

There are no native vegetation communities within the Proposal site. The vegetation on and adjoining the Proposal site does not conform to any threatened ecological communities listed under the TSC Act or the EPBC Act.

Eucalyptus nicholii, recorded along the western boundary of the site, is listed as Vulnerable under the EPBC Act and TSC Act. *Eucalyptus nicholii* is endemic to the Northern Tablelands of NSW, occurring from Nundle to north of Tenterfield (Brooker and Kleinig 2006, OEH 2014). The species is widely planted as a street tree in south-eastern Australia. These planted individuals are not of conservation significance.

There is no suitable potential habitat for locally occurring threatened flora species either within or adjacent to the Proposal site.

Vegetation on the Proposal site is unlikely to provide habitat to any terrestrial threatened fauna with the possible exception of Grey-headed Flying-fox (*Pteropus poliocephalus*), listed as Vulnerable under the EPBC Act and BC Act. The species is known to forage on *Banksia integrifolia*, which are present. Built structures on the Proposal site were not inspected internally, though they are unlikely to provide habitat for any threatened species.

7.8.2 Mitigation measures

The Proposal site is considered to be of relatively low biodiversity value therefore no specific mitigation is deemed necessary.

8 REVISED COMPILATION OF MITIGATION MEASURES

The EIS for the Proposal identified a range of environmental impacts and recommended management and mitigation measures to avoid, remedy or mitigate the identified impacts (Section 6.11 of the EIS). These mitigation measures have been revised in response to submissions received during the public exhibition period and to address the impacts of the amendments to the Proposal.

The revised mitigation measures represent the final mitigation measures for the Amended Proposal and are provide in Table 8-1 below.

Table 8-1 Revised compilation of mitigation measures

No.	Mitigation Measure	Implementation stage
General		
G1	A CEMP will be developed and submitted to the approval authority prior to the issue of relevant certificate under section 109R of the Act. The plan will address: • Proposed demolition and construction hours; • Pedestrian and traffic management during demolition and construction; • Stormwater and waste management; • Noise management; and • Contamination.	Pre-construction
G2	A development specific Operational Environmental Management Plan (OEMP) will be updated to control the day to day handling of waste both on and off site. The OEMP will include protocols and procedures relating to: • Waste acceptance; • Waste source control; • On site storage requirements; • Resource recovery requirements; • Green waste management; • Operational noise management; • Dust and air quality management; • Management and maintenance of stormwater infrastructure; • Transport and Disposal (Waste Tracking); and • Stockpile Management; • Special Waste Management (Asbestos and Tyres); • Third party material sampling; and • Weighbridge operation (including calibration). A final OEMP will be reviewed by the EPA prior to the variation of the EPL. Commencement of operations or the release of an occupation certificate under Section 109C of the EPA Act. The OEMP will be reviewed on an annual basis or as required under the EPL or the SEQ Management System.	Operation

No.	Mitigation Measure	Implementation stage
Visual impact and built form		
V1	Landscaped areas shall be maintained throughout the site operation.	Operation
Noise and vibration		
NV1	Implementation of the Construction Environmental Management Plan (CEMP) will allow for the monitoring and management of noise generated during construction.	Construction
NV2	Preparation of a Noise Management Plan (NMP) as part of the OEMP. The NMP would address matters such as: • Limiting site hours of operation to align with the NIA. • Implementation of a general vehicle speed limit of 5 km/hr. • Vibration management – handling of heavy materials; • Requirements for ongoing maintenance of fixed and mobile plant in accordance with manufactures specifications; • Development of protocols to ensure processing operations are undertaken wholly within the processing building; and Procedures to handle complaints which would include monitoring requirements to verify exceedances to any thresholds relevant to the project.	Operation
Air quality odour and climate change		
AQ1	The CEMP would include measures to mitigate impacts associated with air quality (dust) associated with construction. This would include but not be limited to: • Use of street sweepers; and • Regular checking and maintenance of soil erosion and sediment control measures. • Where practicable, the disturbance footprint will be limited and unnecessary surface disturbance will be avoided. • Where practicable, dust-generating construction activities will be restricted during hot, dry and windy weather conditions. • Where practicable, materials and structures will be dampened using water sprays prior to demolition and unsealed surfaces will be watered. • Construction machinery and vehicles will be maintained and serviced according to the manufacturer's specifications, and engines will be switched off when not in use. • Construction-related vehicle movements will be limited to a speed limit of 5 km/h. • Vehicles removing earth or other dust generating material from the Proposal site will have their loads covered.	Construction

No.	Mitigation Measure	Implementation stage
	• Regular visual checks of excessive dust within the Proposal site will be undertaken and used to implement additional controls where required.	
AQ2	Prior to the release of a Construction Certificate issued pursuant to Section 109C of the EP & A Act, a report addressing the energy efficiency requirements contained in Section J of the National Construction Code (BCA) will be prepared and submitted to the appointed Principal Certifying Authority. This report will document and assess the suitability of lighting and appliances proposed for the site office space.	Construction
AQ3	An Air Quality Management Plan (AQMP) will be prepared to form part of a comprehensive OEMP. The AQMP will be prepared with regard given to the AQIA and Addendum AQIA and will address matters such as: • The regular maintenance of the operator-activated overhead dust suppression system; • Use of a street sweeper over external hardstand areas; • Maintain protocols to ensure waste stored externally (except for waste awaiting loading onto vehicles) is contained within covered bins; • Use of hand held hoses to supplement overhead dust suppression system; • Use of hand held hoses within any areas not covered by the overhead dust suppression system; • Procedures to cease operations if weather conditions that have a major negative impact on the operation. • Maintenance of a general vehicle speed limit of 5 km/hr across all areas of the site. • Procedure to check all vehicles for soil on tyres prior to leaving the site and where soil is detected on the entrance road (i.e. “track out”), staff will be deployed to sweep the road. • Maintenance requirements for all on-site, fixed and mobile diesel-powered plant (excluding road vehicles) (e.g. manufactures specifications). • Maintenance requirements of wheelwash and stormwater pits to prevent build-up of dust / sediment. • On-going management of air quality issues such as dust suppression, and outlining the mitigation measures to be implemented to minimise the generation of air pollutants. • Implement procedures to handle potential odour generating wastes such as green waste or hidden putrescible wastes. • Implement procedures to handle complaints.	Operation
AQ4	Fixed plant maintenance requirements and practices will be incorporated into the OEMP to ensure all plant is operating in an efficient manner.	Operation

No.	Mitigation Measure	Implementation stage
AQ5	Garden waste materials received on site (i.e. low volumes contained in skip bins from household clean up or demolition sites) are picked and stored separately, then transported off site to a local facility for recycling (i.e. mulched, chipped and/or composted). The final OEMP will include details relating to the identification, handling and diversion of greenwaste.	Operation
Hazards assessment		
HR1	To ensure the risks associated with the storage of potentially dangerous goods are not increased, the following measures will be implemented: • Storage of diesel fuel will be limited to the quantities contained in this EIS and the SEPP 33 Risk Screening Assessment; • Diesel fuel will be stored within a bunded area and in isolation of any other flammable liquids.	Operation
Waste, soils and water		
WS1	The CEMP will include measures to mitigate impacts associated with water quality associated with construction. This would include but not be limited to: • Regular checking and maintenance of soil erosion and sediment control measures; • Procedures for monitoring water quality during the construction phase if required; and • Procedures for managing groundwater should it be encountered.	Construction
WS2	A Water Cycle Management Plan (WCMP) will be prepared to form part of a comprehensive OEMP. The OEMP will address matters such as: • The regular maintenance of control measures including: – Stormwater 360 Storm filter treatment device; – Litter baskets; – Rainwater tank; – Gutters and downpipes; – Sweeping of internal and external hardstand areas; – Cleaning and removal of any leachate generated from blind sumps; and – Fogging system. • Procedures to ensure all wastes (except waste awaiting loading onto vehicles) are stored in an enclosed environment. • Maintenance of a maximum vehicle speed limit of 5 km/hr across all areas of the site.	Operation

No.	Mitigation Measure	Implementation stage
	• Procedure to check all vehicles are inspected for soil on tyres prior to leaving site and where soil is detected on the entrance road (i.e. “track out”), staff will be deployed to sweep the road.	
Contamination		
CM1	The CEMP will further report on the results of subsurface materials testing and will provide protocols to ensure the health and safety of construction workers when handling or working within disturbed areas and will include protocols for managing groundwater should it be encountered.	Construction
CM2	Any testing of material will be undertaken in accordance with the relevant guidelines made under the CLM Act. Should further approvals be required to undertake construction or remediation work, they will be sought and secured prior to the commencement of any works.	Construction
CM3	An updated PIRMP would be developed to provide management protocols in the event of an incident associated with the proposal. The updated PIRMP will be submitted to the NSW EPA as part of any application to modify the EPL for the site.	Operation
Access traffic and parking		
TP1	The CEMP would include measures to mitigate impacts associated with construction traffic including but not limited to: • Hours of operations; • Temporary parking arrangements; • Access and manoeuvring arrangements; • Traffic control requirements; and • Oversize Vehicle Permits and arrangements (e.g. floating of plant and equipment).	Construction
TP2	An Operational Traffic Management Plan (OTMP) would be updated to manage traffic impacts associated with the development and would form part of the OEMP. The OTMP would contain: • Identification of preferred routes to minimise noise impacts on the surrounding community; • Physical and operational measures (including signage) to mitigate noise impacts from vehicles accessing and leaving the site; • Measures to limit the impact of traffic noise • Maintaining internal swept vehicle paths through appropriate line marking to prevent the encroachment of external bin storage on manoeuvring and parking areas; • Driver education and information to promote driver habits to minimise noise and awareness of preferred heavy vehicle routes; and • Timetabling, scheduling and vehicle booking systems where possible.	Operation

9 CONCLUSION

Bingo Recycling Pty Ltd are seeking approval for an increase in processing capacity at the Minto Resource Recovery Facility. The Environmental Impact Statement (EIS) for the Proposal was publicly exhibited between 29 June and 14 August 2017

This RtS has been prepared in accordance with clause 83 of the Environmental Planning and Assessment Regulation 2000, to address comments raised by both government agencies and the community during the public exhibition of the EIS. This RtS provides further information and justification for the Proposal in order to respond to and address the submissions received.

This RtS also included amendments to the exhibited Proposal, now known as the Amended Proposal. These amendments have been undertaken to address submission received, reflect progression in design development since lodgement of the EIS, provide additional clarity, and also to minimise the overall environmental impact of the Proposal.

The mitigation measures provided within the EIS have been updated to respond to the submission received (refer to Section 8 of this RtS) and address the scope of the Amended Proposal. Overall, the assessment identifies that the Amended Proposal would, subject to the implementation of updated mitigation measures, result in no substantial environmental impacts in addition to those identified within the EIS.