22 August 2017

Ms Chloe Dunlop
Senior Planner, Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Madam,

RE: SSD 7462 – Minto Recycling Pty Ltd (Bingo Industries)
No. 13 Pembury Road, Minto

I refer to the Department's correspondence regarding the proposal to increase the permitted tonnage of waste per annum permitted to be handled at the subject site from 30,000 tonnes to 220,000 tonnes, with some alterations/additions to existing buildings and amenities on the site.

As you are aware, Council has a relatively significant and ongoing compliance management history at the site, details of which have previously been provided to the Department under separate cover.

With this in mind and upon review of the submitted documentation, Council wishes to make the following comments on the current proposal:

Notifications and 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.

Traffic and operational issues:
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 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.

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.

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, ie. entire loads of VENM , entire loads of building and demolition waste, entire loads of 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.

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.

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 (eg. 7.00am to 4.00pm) is practical and desirable.

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
- 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.

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 on-site vehicle stacking was calculated.

The Traffic Impact Assessment states that '*Once light waste is separated in Shed C, a Liebherr Hydralic 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.

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.

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. 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.

Environmental issues:
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.

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.

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 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.

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 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.

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.

Other Matters:
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 validate the destinations of products emanating from the processing of input waste streams.

Further, 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.

Conclusion:
The application highlights a number of significant logistical challenges. Recent observations suggest that there are operational issues with the site with current incoming load rates. By comparison with other similar operations (measured as a function of site size to incoming tonnes per annum), it is questionable whether this site is capable of sustaining the proposed operation of 220,000 tonnes per year.

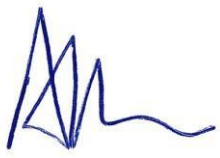
There are significant issues regarding migration of particulate matter from the site, both airborne and on-ground, which are not considered to be satisfactorily addressed in the application.

Council agrees in principle that a construction and demolition waste processing facility is a necessary piece of resource recovery infrastructure for south-west Sydney. However, there is a significant concern with this application in that it appears to extend the limitations of the site beyond its design capabilities. That is, the proposed tonnages, potential environmental impacts and traffic management concerns would exceed the site's capabilities thus impacting significantly on neighbouring and nearby premises

I trust that this assists your assessment of the proposal.

Thank you again for the opportunity to comment on the subject state significant development proposal and I apologise for the delay in sending this response to you.

If you require any further information please contact Andrew MacGee or Paul Macdonald on (02) 4645 4616.



James Baldwin, per
Director City Development