

Director - Industry Assessments
Planning and Assessment
Department of Planning , Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

To: Director - Industry Assessments

Re: Minto Waste and Resource Recovery Facility (SSD-5339) Environmental Impact Statement

Austex Dies Pty Ltd has been manufacturing dies for aluminium extrusion for over 40 years.

The company is located at 13 Montore rd, Minto 2566, just 100 meters away from the proposed Minto Waste and Resource Recovery facility at 7 Montore Road, Minto.

We employ 25 people and our customer are in Australia and New Zealand.

We are a major supplier for building, medical, transport and defence industry.

The quality of Austex Dies products is key to the success of its business and this proposed development would endanger this.

As such, Austex Dies has significant concerns over the siting of a resource recovery facility so close to the manufacturing with the potential to affect the quality of the products and impact on the health and welfare of its employees. Should the Department of Planning, Industry and Environment (DPIE) grant permission for this proposed development, Austex Dies would be forced to seriously consider relocating or even closing its business permanently. Either scenario would cost millions of dollars and therefore the costs would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The concerns that Austex Dies has about this proposed development are outlined in the following sections.

AIR QUALITY

The proposed Minto Waste and Resource Recovery facility was designated a State Significant Development (SSD) and issued Secretary's Environmental Assessment Requirements (SEARs). Regarding air quality, the following SEARs are applicable:

'air quality and odour – including:

A quantitative assessment of the potential air quality and odour impacts for the development on the surrounding landowners and sensitive receptors;

Construction and operational impacts, including dust generation from the transport of material; and

Details of the proposed management and monitoring measures'

Austex Dies has reviewed the Air Quality Impact Assessment (AQIA) report (Concrete Recyclers Air Quality Impact Assessment, Report No. 12166-A, Version A, February 2019) and makes the following comments and questions in the section below.

REMEDIATION

Section 13 *Site Contamination* of the EIS provides detail on the type and level of contamination at the site. It indicated that friable and bonded asbestos containing material (ACM) were identified in fill soils from the southern section of the site, including within two stockpiles.

The report states:

'Friable and bonded asbestos-containing materials (ACM) were identified in fill soils from the southern portion of the site, as well as within two stockpiles'.

'The EI (2020) additional investigation confirmed the presence of ACM in southern half of the site and delineated the areas of impact. It was concluded that the ACM posed a moderate to high risk to (future) human receptors. Remediation of the land was therefore necessary, in order for it to be suitable for the proposed (resource recovery facility) development'.

The EI (2020) additional investigation report recommended preparation of a Remedial Action Plan (RAP) and an Asbestos Management Plan for the site. A RAP was prepared for the site and included as Appendix 15 of the EIS. Its objective *'is to guide remediation of the site, by providing detailed procedures that comply with relevant guidelines, yet prevent adverse effects on human and environmental receptors'*.

However, an Asbestos Management Plan was not included with the EIS. Why not? A plan to manage and monitor asbestos would provide confidence in the proposed remediation process.

Austex Dies is concerned about the presence of ACM during remediation works particularly given its presence in the southern section of the site and the possible effect on the health and well-being of its employees. Some questions regarding asbestos removal include:

Where will monitoring take place?

What type of monitoring will occur? Environmental and/or occupational?

Frequency of monitoring? How many samples?

What are the monitoring procedures?

What company will conduct the work?

CONSTRUCTION

The AQIA did not address the potential impacts from construction nor how they would be managed. In fact, air quality impacts during construction were not addressed in the AQIA report at all which is not compliant with the SEARs requirements as outlined above. Additionally, no air monitoring (asbestos and dust) has been proposed to demonstrate that construction works at the proposed development would not have an impact beyond its site boundary i.e. impacting on Austex's manufacturing facility and its products.

Section 2.16 *Sequence of Construction of the Proposal* of the Environmental Impact Statement (EIS) for the proposed development appears to be the only reference to construction activities but provides no information about the construction schedule, type and number of mobile plant machinery and trucks, timing and hours of operation. Additionally, there is no mention of proposed management measures or monitoring during construction works.

As dust (PM₁₀ and PM_{2.5}) is likely to be generated during construction activities which may impact on Austex Dies, it is remiss of Camolaw Pty Ltd that the AQIA report does not address construction impacts.

OPERATION

Austex Dies has the following questions regarding air quality impacts during operations:

Was the meteorological modelling conducted in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (NSW EPA 2016)? If so, how?

Why was the year 2017 chosen for the air dispersion modelling? Section 4.1.2 states '*Wind speed and direction during 2017 are generally representative of the five-year period and have therefore been adopted for assessment purposes*'. There is no detailed analysis of why 2017 was chosen rather than any of the other years.

It is understood the crushing and screening plant would be housed inside a shed. How were these sources modelled? It understood a fogging system would be used to control dust. How effective is this system to manage dust generation? Crushing and screening operations are known to create high levels of dust.

It seems that the crushing and screening plant is not fully enclosed with conveyors extending from the shed via 6 metre (m) high openings on the eastern and southern facades. Air emissions from conveyors were not included as sources. Please explain why? Are they proposed to be covered?

The sand washing plant which includes a generator and screens was not included as an air emission source. Please explain why?

It appears that there are several external conveyors (and possibly conveyor transfer points) used in stockpiling activities. However, they were not included as air emission sources. Please explain why?

The pug mill and the pug mill silo were not included as sources in the model. What was the reason for their exclusion?

A contemporaneous assessment was undertaken for Industrial Receivers 1, 2 and 3. The graphs indicate that predicted emissions from the site cause an exceedance of the 24 hour PM_{2.5} impact assessment criterion at all sensitive receivers in August 2017. This is not referred to in the AQIA report. Furthermore, predicted PM₁₀ emissions from the proposed development cause the 50 µg/m³ assessment criterion to be reached in March 2017 at sensitive receiver I2. Again, this is not mentioned in the AQIA report.

The AQIA report mentions only four proposed management measures. These measures alone will not ensure impacts at Austex Dies are minimised. A whole suite of management and controls should have been included in the report.

An Air Quality Management Plan or a dust monitoring program was not proposed for the development. A permanent and continuous dust monitor that measures PM₁₀ and PM_{2.5} should be placed along the southern boundary of the proposed development given the predicted high particulate matter concentrations at the Austex Dies facility.

While not expected to be a potential issue, odour was not addressed in the AQIA report. The SEARS specifically requests an assessment of potential odour impacts.

Overall, Austex Dies consider that the air quality impacts from the proposed development should be re-assessed to take account of the comments raised in the sections above. Austex Dies are concerned that impacts from a potentially high generating dust activity were not adequately addressed and that the proposed dust control measures are insufficient to ensure there are no impacts to the Austex Dies manufacturing facility and its products.

NOISE

Regarding noise and vibration, the following SEARs are applicable:

'noise and vibration – including:

*A quantitative assessment of the potential construction, operational and transport noise and vibration impact;
and*

Details of the proposed noise and vibration management and monitoring measures'.

Austex Dies has reviewed the Acoustic Impact Assessment report (Materials Recycling Facility, Noise Assessment, Report No. 12166-N, Version D, January 2019) and makes the following comments and questions in the section below.

Section 4.4 indicates that predicted noise levels from site activities reaches the NSW *Noise Policy for Industry* (NPfI) criterion of 70dBA. A 6 m high wall is proposed along the northern and western boundaries but not for the southern section of the site. Please explain the reason for this.

Construction noise levels at sensitive receivers were not assessed. Please explain why?

There are no management measures proposed nor noise monitoring during operational activities. Please explain why?

A Noise and Vibration Management Plan was not proposed for the site. Please explain why?

CONCLUSION

A review of the Air Quality and Noise Impact Assessment reports conclude that both reports lack clarity in assessment approach. In addition, there is minimal reference to proposed management measures during both construction and operation and no proposed monitoring during operation of the proposed development. Austex Dies requests that the air quality and noise assessments are re-assessed to take account of the comments made in this submission and address the questions.

The siting of the proposed development close to the Austex Dies facility will have a detrimental effect on its business and likely force it to relocate at huge cost or even close its business permanently. The cost incurred towards this exercise would need to be borne either by the developer or getting necessary financial assistance from the state planning department.

The quality of its product is key to the success of Austex Dies. Activities at the proposed Minto Waste and Resource Recovery development could compromise this quality.

Yours sincerely

Alessandro Ferrari

Austex Dies

General Manager

Alessandro.ferrari@austexdies.com

M: 0416160441