



DOC16/566696-03:MF
DA-318-12-2014 MOD 3

Ms Kerry Hamann
Senior Planner
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Hamann

**Allied Mills Pty Limited – Section 75W Application to Modify
Development Consent DA-318-12-2014 MOD 3**

I am writing in response to your email dated 8 November 2016 to the Environment Protection Authority (EPA) inviting comments and recommended conditions of consent on the above Modification (Mod) relating to the wastewater management facility on the site.

The EPA provides the attached initial recommended conditions of consent (**Attachment A**) to assist the Department of Planning and Environment (DPE) in the assessment and determination of this modification. The Allied Mills premises is regulated by an Environment Protection Licence (EPL) 12498). If the Mod is approved the EPL will need to be varied to ensure consistency with the consent.

In providing these initial recommended conditions of consent the EPA has taken into account the conditions of consent proposed by the proponent in the Mod application and Response to Submissions (RTS).

The RTS does not propose any wet weather storage in the current proposal. The original development (2005) appears to have included a 100 kilolitre storage tank. The EPA requests the opportunity to further consider the information in the Mod application and RTS in regard to the issue of wet weather storage. This includes the modelling that was undertaken using a water balance to ensure the environmental performance objectives of the attached conditions and relevant guidelines are satisfied. These guidelines include - *On-site Sewage Management for Single Households* (Department of Local Government; et al, 1998) and *Use of Effluent by Irrigation* (DEC, 2004). Based on EPA experience in the Wollondilly LGA, wet weather storage is a critical element to ensure effluent reuse proposals can be managed sustainably.

The EPA expects to provide additional advice by 16 December 2016. The EPA may have further comments and recommended conditions of consent following further consideration of the above.

Please contact the officer if you have any questions regarding the above.

Yours sincerely

William Dove 16 November 2016

WILLIAM DOVE
Unit Head Regulation
Environment Protection Authority

Contact officer: MATT FULLER
(02) 4224 4100

ATTACHMENT A

Effluent application to land

1. Effluent application must not occur in a manner that causes surface runoff.
2. Spray from effluent application must not drift beyond the boundary of the premises.
3. Pasture or fodder crops must not be harvested before the effluent utilisation area has dried.
4. The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids.

For the purpose of this condition, "*effectively utilise*" includes the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.

