

16 July 2020

Regulatory and Compliance Support Unit
Environmental Protection Authority (EPA)
PO Box A290
Sydney South NSW 1232

Nick Ebrill – Facility Manager
Cargill Australia Limited
51 Raven St
Kooragang Island NSW 2304

Subject: Attachment Letter for Environment Protection Licence 5810 – Annual Return 2019-2020

To Regulatory and Compliance Support Unit

The following submission is an accompanying letter to Cargill Australia Limited's Annual Return for 2019-2020. Cargill Australia Limited is herein referred to as Cargill.

Cargill is located on Kooragang Island NSW, and operates under Environmental Protection Licence (EPL) 5810. The facility is located at 51 Raven Street, Kooragang Island NSW, which is an industrial region north of Newcastle's city centre. Cargill also operates the Kooragang Oil Shipping Terminal (the Terminal) located at 40 Heron Road Kooragang Island NSW and transfer pipeline between the two sites. The Terminal's activities are now part of operations under EPL 5810. The Annual Return documentation covers the period 1 June 2019 to 31 May 2020.

The following accompanying letter and documentation is to provide NSW EPA with additional information regarding the Annual Return submission for Cargill.

Cargill's EPL 5810

The EPL is in the current version dated 14 January 2016.

Cargill's Fee-Based Activities

Cargill's fee-based activity includes *General Agricultural Processing* at a range of >250,000 tonnes - <260,000 tonnes. During the 2019-2020 Annual Return period Cargill processed 252,874 Mt of oilseed.

Cargill's fee-based activity also includes Shipping in bulk at a range of 0 – 100,000 tonnes loaded and unloaded. During the 2019-2020 Annual Return period Cargill shipped 64,465.895 Mt.



Cargill's EPL Condition U1 – PRP 5 – Design of Wastewater Treatment System Upgrades

Condition U1 of Cargill's EPL states the following:

U1.1. The licensee must undertake the design of the proposed modification of the existing wastewater treatment plant to improve water quality to a level suitable for using recycled water in the facility's cooling towers, biofilter humidifier and potentially the DC scrubber; and with the residual waste stream from recycling operations and the onsite sewage treatment system to be discharged to sewer.

By 1 February 2016, the licensee must submit the necessary approval documentation to the NSW Department of Planning and Environment seeking development consent under the NSW Environmental Planning and Assessment Act 1979 in respect of the above proposed modification works.

The licensee must provide written notification to the EPA's Regional Manager – Hunter, at PO Box 488G, Newcastle NSW 2300 or by email to hunter.region@epa.nsw.gov.au, advising the submission of the above approval documentation to the NSW Department of Planning and Environment.

Date for completion: 1 April 2016

Cargill completed PRP 5 by the due date of 1 April 2016. Consent has been granted from the Department of Planning and Environment, with issue of approvals DA 18/95 MOD2, and MP 05_0122 MOD 3.

Cargill are currently preparing an option to present to EPA as a PRP 6. It is planned that PRP 6 will cover the Cargill Wastewater Treatment Plant physical upgrade and actual trade waste connection to Hunter Water's sewer system.

Cargill's EPL Condition L4, M4 and E1

Condition L4.1 of Cargill's EPL states that 'the licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises. Condition E1 of Cargill's EPL also states that 'The licensee or its employees must notify the EPA of the details of every odour complaint received, the action taken to identify the source and the action taken to control the odour within 24 hours of receiving the complaint'. Condition M4 states that 'The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies'.

During the environmental reporting year of 1 June 2019 to 31 May 2020, no odour complaints were received by Cargill.

Cargill continues to monitor the odour emissions and treatment systems from the plant.



Condition R1.8 – Annual Return Monitoring Report

Condition R1.8 of EPL 5810 states that *‘the licensee must supply with the annual return a report, which provides:*

- a) An analysis and interpretation of monitoring results; and*
- b) Actions to correct identified adverse trends.*

The monitoring reports completed for Cargill during the licence period are attached to the submission as appendices. The monitoring was completed for the EPL points outlined in Table 2.

Table 2: Cargill monitoring points for 2019-2020 period as specified in EPL

EPL Point(s)	Identification	Monitoring Requirement
1	15MW Boiler	Air emissions
4	Meal Grinding	Air emissions
10	High Pressure Boiler	Air emissions
11	3MW Boiler	Air emissions
6, 7, 8 and 9	Groundwater boreholes	Groundwater quality
12 and 13	Discharge to utilisation areas	Wastewater quality and volume flow
14,15, 16 and 17	Irrigation Areas	Soil quality

Licence Conditions M2 and L2.3 – Air Monitoring

Licence condition M2 states that Cargill is to monitor EPL Points 1, 4, 10 and 11 annually for specified air emissions. The monitoring and frequency for sampling was met, with sampling performed on the following dates:

- EPL Points 1, and 10 on 27 November 2019
- EPL Points 4 and 11 on 17 December 2019

Licence Condition L2.3 states that air emission monitoring concentration results at Points 1, 10 and 11 are not to exceed 350 mg/m³ of nitrogen oxides (NO_x). The results shown in the Annual Return demonstrate that this value was not exceeded at these points.

The Stack Emission Compliance Reports displaying these results are available in Appendix A.



Licence Condition M2 – Groundwater Monitoring

Licence Condition M2 states that Cargill is to monitor EPL Points 6, 7, 8 and 9 every six months for groundwater quality monitoring. Groundwater monitoring was completed in July 2018 and January 2019.

Cargill's groundwater bores 2 and 4 were found to be broken such that samples were not able to be taken in July 2019. Cargill undertook repairs and extra samples were taken in April 2020. Cargill's Groundwater Monitoring Reports for July 2019, January 2020 and April 2020 are attached as Appendix B. Groundwater results have been collected at Cargill for over a decade, with the April 2020 report displaying the latest historical data trendline for monitoring completed.

Licence Condition M2 – Effluent and Soil Monitoring

Licence Condition M2 states that monitoring of EPL Points 12 and 13 is required, with yearly and quarterly frequencies for various sampling parameters. Point 12 corresponds to the Wastewater Treatment Plant effluent for use in the 'Spray Irrigation' area, and Point 13 corresponds to the Sewage Treatment Plant effluent utilised in the 'Drip Irrigation' area.

Parameters which require yearly sampling have been completed and those which require quarterly sampling have been completed the minimum required number of times during the annual return period. Sampling for points 12 and 13 was completed in July 2019, October 2019, January 2020, and April 2020. The quarterly effluent monitoring results are attached in Appendix B.

Licence condition M2 states that Cargill is to monitor EPA Points 14, 15, 16 and 17 at frequencies of yearly, and every three (3) years, for specific soil parameters. Effluent from the wastewater treatment plant originates at Point 12 and is used to irrigate Point 14, 16 and 17. Effluent from the sewage water treatment plant originates at Point 13 and is used to irrigate Point 15, which is described in the EPL as the 'drip irrigation area'. The annual analytes were performed in December 2019 and the report is presented in Appendix C.

Licence Condition M6 – Requirement to monitor volume or mass

Licence Condition M6.1 states the licensee must monitor the volume of liquid discharged from EPL Points 12 and 13 daily.

Please refer to the following section for details regarding Condition M6.



Non-compliance with Licence Condition M6 – Requirement to monitor volume or mass

For the June 2019 to May 2020 licence period, liquid volumes were monitored from EPL Point 12, and EPL Point 13. The results for EPL 12 and EPL 13 were influenced by a planned site power outage that occurred such that no water was irrigated on 6th, 7th and 11th of January 2020. The planned plant power outage at this time was due to a production plant shut down. During shutdown no treated process wastewater was produced. This information is provided to EPA as supporting information and is not considered to be a part of a non-compliance, as irrigation did not occur during the time of planned power outage.

Cargill's EPL Condition E2.1 – Positioning of Sampling Ports

EPL 5810 Special Condition E2.1 states that all stack air emission points *'must be designed to accommodate and be built with sampling ports that conform with TM-1 of the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales, August 2005'*.

All monitored sampling points at Cargill Kooragang are compliant with the *Approved Methods*, as detailed in the 2012-2013 Annual Return submission.

Website publication of monitoring data

Cargill publishes the EPL monitoring data on the website in accordance with the POEO requirements for all EPL monitoring points in a meaningful summary. During the 2019-2020 period all EPL monitoring data was published on the website in line with requirements.

Cargill published all other EPL monitoring data on the website in accordance with the POEO requirements for all EPL monitoring points in a meaningful summary for the 2019-2020 period.

Conclusion

The Annual Return Declaration Form has been completed and signed by Cargill to certify that the attached is a true and accurate statement of environmental performance against Cargill's EPL 5810. If you have any questions regarding this letter, please do not hesitate to email or call MJM's office on 02 4926 4222.

Regards

Monica Majerowski

Monica Majerowski

Technical Director Environment

BE(Chem) FIEAust CPEng RPEQ NPER



Limitations

Scope of Services and Reliance of Data

This Annual Return Report 2019-2020 (“the report”) has been prepared in accordance with the scope of work/services agreed, between MJM Environmental Pty Ltd (MJM) and the Client. In preparing the report, MJM has relied upon data and other information provided by the Client and other individuals and organisations. Except as otherwise stated in the report, MJM has not verified the accuracy or completeness of the data. To the extent that the statements, opinions, facts, information, conclusions and/or recommendations in the report (“conclusions/summary”) are based in whole or part on the data, those conclusions are contingent upon the accuracy and completeness of the data. MJM will not be liable in relation to incorrect conclusions should any data, information or condition be incorrect or have been concealed, withheld, misrepresented or otherwise not fully disclosed to MJM.

Study for Benefit of Client

This report has been prepared for the exclusive benefit of the Client and no other party. MJM assumes no responsibility and will not be liable to any other person or organisation for or in relation to any matter dealt with in this report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this report (including without limitation matters arising from any negligent act or omission of MJM or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this report). Other parties should not rely upon the report or the accuracy or completeness of any conclusions and should make their own inquiries and obtain independent advice in relation to such matters.

Other Limitations

To the best of MJM’s knowledge, the proposal presented, and the facts and matters described in this report reasonably represent the Client’s intentions at the time of printing of the report. However, the passage of time, the manifestation of latent conditions or the impact of future events (including a change in applicable law) may have resulted in a variation of the Proposal and of its possible environmental impact. MJM will not be liable to update or revise the report to consider any events or emergent circumstances or facts occurring or becoming apparent after the date of the report.



Appendix A – Stack Emission Compliance Report



Appendix B – Groundwater and Effluent Monitoring Reports



Appendix C – Soil Monitoring Report

