



Odour Management Plan

Enviroking

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Enviroking Pty Ltd
843 John Renshaw Drive
Blackhill
NSW

Version 7

For internal Enviroking use and distribution only.

Odour Management Plan

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DOCUMENT CONTROL

Reference	Status	Date	Prepared	Checked	Authorised	Changes Made
	Version 1	October 2013	SLR (Chris Jones)	T Warneken	R Lodge	
	Version 2	October 2016	Enviroking	T Warneken	R Lodge	
	Version 3	November 2017	Enviroking	T Warneken	R Lodge	
	Version 4	November 2018	Enviroking	T Warneken	R Lodge	
	Version 5	October 2019	Enviroking	E Brigden	R Lodge	
	Version 6	August 2022	Enviroking	R Lodge	R Lodge	
	Version 7	January 2023	Enviroking	K Harper	R Lodge	Section 3 reference error. No material changes required.

Table of Contents

1	INTRODUCTION	1
2	SCOPE AND OBJECTIVES	1
3	PERFORMANCE CRITERIA	1
4	SOURCES OF ODOUR	2
5	RISK MANAGEMENT AND CONTROLS	2
6	MANAGEMENT PROCEDURE	3
	6.1 Detection of Odour	3
	6.2 Response to Odour Issue	4
7	MONITORING THE EFFECTIVENESS OF ODOUR MANAGEMENT	4
	7.1 Review of Odour Management Plan	4
8	COMPLIANCE	4
	8.1 Compliance with Regulations	5
9	RESPONSIBILITIES	6

TABLES

Table 1 – Odour Management Requirements of PA 07_0048	2
Table 2 – Summary of odour risks and controls	3

1 INTRODUCTION

Enviroking Liquid Waste Facility, operated by Enviroking Pty Ltd, is located at 843 John Renshaw Drive, Blackhill (Lot 931 DP 816814), within the Cessnock City Council (*here after Council*) local government area. The facility receives and treats liquid waste and reuses treated waste by exempted land application and irrigation, or disposal into landfill, sewage treatment plants or other licensed facilities.

The facility was designed and constructed to treat a minimum of 15,000 tonnes of liquid waste per annum, which was granted by an Environment Protection License (EPL), by the NSW EPA. Council granted consent in November 1998 and restricted the facility to treat only 5,000 tonnes per year.

In August 2010, Enviroking was granted an EPL (EPL 11180) to expand the facility to treat up to 20,000 tonnes of liquid waste per annum. The development will involve the following:

- An extension of the existing building to house the proposed treated effluent tanks, including bunding, workshop and truck wash bay area;
- An awning and extension to the existing building to cover the main access to the building and to enclose the existing sludge pit and provide cover over the existing truck receival pit; and
- Upgrading the ventilation systems within the treatment building.

2 SCOPE AND OBJECTIVES

The key objectives for odour management for Enviroking are summarised below:

- Identification of odour sources;
- Put controls in place to effectively manage odour;
- Ensure employees and contractors are responsible for odour management; and
- No impacts to community from odour.

3 PERFORMANCE CRITERIA

Schedule 3 Condition 10 & 11 of the Project Approval (PA 07_0048) outlines the key odour management requirements for the site (see **Table 1**).

Table 1 – Odour Management Requirements of PA 07_0048

Condition No.	Consent Requirement	Section in Document
Schedule 3 Condition 10	<p>The Proponent shall not cause or permit the emission of offensive odours from the site, as defined under Section 129 of the <i>Protection of the Environment Operations Act 1997</i>.</p> <p>Note: <i>Section 129 of the Protection of the Environment Operations Act, 1997 provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence at minimising odour.</i></p>	This document
Schedule 3 Condition 11	<p>Prior to the commencement of the Project's operations on site, the Proponent shall:</p> <p>a) install an additional hood and stack ventilation system on the right-hand side of the treatment building as indicated on the site plans and building elevations in Appendix 1 of this approval; and</p> <p>b) ensure that the stack discharges must be a minimum of 2 metres above the roof ridge and the stack exit velocity at least 10 metres per second.</p>	Section 5
Statement of Commitments	<p>Enviroking will select farms where odour impact is likely to be minimal having regard for proximity to roads and dwellings.</p>	Section 5

Section 15a of the *Clean Air Act 1961* makes it an offence for odours to be detectable by authorised officers outside premises scheduled under the Act. Control measures can be imposed by the EPA, particularly when the odour is assessed to be offensive.

4 SOURCES OF ODOUR

The main sources of odour from the Enviroking facility include:

- Grease trap waste arriving at the Enviroking facility;
- Processing of waste and oily water at the Enviroking facility;
- Removal of treated sludge from the Enviroking facility; and
- Removal of treated water from the Enviroking facility to Hunter Water.

5 RISK MANAGEMENT AND CONTROLS

An environment and community broad brush risk assessment (BBRA) was prepared in September 2013 by SLR and Enviroking to review the key environment and community risks associated with the different aspects of the operation. The BBRA forms part of the Environmental Management Strategy for the Enviroking facility.

In summary, key odour management risks and controls are outlined in **Table 2** and include:

Table 2 – Summary of odour risks and controls

Aspect	Current Control	Additional Controls
Odour at the Enviroking Facility	<ul style="list-style-type: none"> • No odour complaints for Five years (as of October 2018). • Mindful of processing during windy days. • Lockable shed and ventilation system. • Additional hood and stack ventilation system on the right-hand side of the treatment building has been installed and is functioning. • Stack discharges are greater than 2 metres above the roof ridge and the stack exit velocity at least 10 metres per second. • Greater than 800m from nearest neighbour. • Housekeeping and cleaning. • Waste MP outlines spill response. • Complaints procedure. • Regular inspections and review of odour at the front gate of the Enviroking facility. 	<ul style="list-style-type: none"> • Vent stack installed & upgraded. • Odour MP is developed (this document). • New residence approx. 800mtrs opposite site of road.
Odour issue from the application of waste material on designated properties	<ul style="list-style-type: none"> • Designated properties. • All liquid waste is injected into the subsoil. • Designated application rates. • Property owner to inform Enviroking if odour issues. 	<ul style="list-style-type: none"> • None

6 MANAGEMENT PROCEDURE

6.1 Detection of Odour

The following inspections are completed at the Enviroking Facility.

- Daily inspection of the operation by the senior plant staff. Any issues are noted and actioned.
- Plant staff are responsible for conducting initial visual and odour inspections of each truckload of liquid waste delivered to the site.
- Weekly run sheet completed by the plant representative. Any issues are noted and actioned.
- Monthly environmental inspection of the operation. Any issues are noted and actioned.

6.2 Response to Odour Issue

Any response to odour complaints are outlined in **section 8** below.

If an odour issue is detected by a representative of Enviroking through an inspection or through general operations the following steps will be completed:

- Director is to be notified;
- Ensure all doors associated with the shed are closed;
- Review of odour at the front gate;
- Review of meteorological conditions at the time of the odour issue;
- Ensure all controls in table 2 are in place;
- If required completion of incident report and completion of associated actions; and
- If required undertake odour modelling and monitoring by an independent odour specialist.

The sampling and analysis methods to determine odour levels are included in *Approved methods for the sampling and analysis of air pollutants in New South Wales (NSW OEH)*.

7 MONITORING THE EFFECTIVENESS OF ODOUR MANAGEMENT

An Annual Return Report is required to be submitted to OEH annually as part of the EPL condition. The Annual Return documents a Statement of Compliance with EPL 11180 and a Monitoring and Complaints Summary. These reporting mechanisms allow Enviroking to review problems with odour and hence assess the effectiveness of the *Odour Management Plan*.

7.1 Review of Odour Management Plan

This *Odour Management Plan* should be reviewed every three years prior to any proposed operational changes to the facility. Any changes to the operation of the facility are considered to include the following issues related to odour management:

- Increased type or quantity of incoming waste to be treated or treated liquid waste product;
- Changes in the treatment procedures;
- Change of ownership;
- Transfer of EPL licence;
- EPL licence renewal;
- Revocation or surrender of EPL; and
- Any non-compliance or complaint recorded regarding the inadequacy of the *Odour Management Plan*.

8 COMPLIANCE

It is the responsibility of the Director to ensure correct methods for odour management are followed and complied by all employees. It is a condition of employment at Enviroking that employees abide by this management plan and the Environmental Management Strategy. Formal warnings and guidance will be issued to employees who contravene these procedures, where appropriate.

In all cases of non-compliance, the Director must be notified immediately, followed by the appropriate corrective action. If necessary, a complaint or incident record will be raised to record the non-compliance and provide a record of the actions taken to rectify the problem.

All complaints must be recorded and documented including the following details:

- Date and time of complaint;
- Method by which of the complaint was made;
- Personal details of the complainant which were provided by the complainant;
- Nature of the complaint (nature of the non-compliance)
- Corrective action taken in relation to the complaint/non-compliance including any follow-up contact with the complaint/non-compliance; and
- If no action was taken by the management, the reasons why no action was taken.

8.1 Compliance with Regulations

The following regulations and requirements are taken into consideration in preparing this *Odour Management Plan*:

- *Approved methods for the sampling and analysis of air pollutants in New South Wales (NSW OEH);*
- *Protection of the Environment Operations Act 1997;*
- *Environment Protection Licence (OEH); and*
- *Assessment and Management of Odour from Stationary Sources in NSW.*

9 RESPONSIBILITIES

Site Management

- Ensure staff and training and aware of odour management procedures;
- Ensure this management plan is fully implemented;
- Undertake inspections in accordance with **section 6.1**; and
- Project management at site.

Contractors

- All contractor personnel are to be fully trained and aware of relevant requirements;
- Undertaking measures to minimise the odour impact from the operation; and
- Ensure appropriate management of wastes and material during transport and disposal.

All Personnel

- Responsible for implementing the requirements of the *Odour Management Plan* and ensuring effective implementation with respect to their work area; and
- Report odours as soon as possible to immediate supervisor and ensure incident reports are completed.