



DOC20/286812-2

The Director
Industry Assessments
Department of Planning, Industry and Environment

Attention: William Hodgkinson

Dear Mr Ritchie

Re SEARS request MP07_0146-MOD 5 – Addition of Bioenergy Plant

I refer to the electronic mail from your William Hodgkinson on 9 April 2020 to the Environment Protection Authority (EPA) seeking our requirements for the preparation of an Environmental Impact Statement for the construction and operation of a Bioenergy Plant at the existing Riverina Oils and Bio Energy Pty Ltd (ROBE) facility located at 177 Trahairs Road, Wagga Wagga.

We have considered the details of the proposal and have identified the information required for the environmental impact assessment as outlined in Attachment A. The EPA's key information requirements for the project include the following.

- Details of how the proposal meets the requirements of the EPA's Energy from Waste Policy Statement (2015); and
- Details of the potential air quality impacts from this proposal, including cumulative impacts, and mitigation measures to minimise these impacts.

In carrying out the assessment the proponent should refer to the relevant guidelines identified at Attachment B.

If you have any further enquiries about this matter please contact Briohny Seaman by telephoning 02 6969 0700 or by electronic mail at riverina.farwest@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'C. Bretherton', followed by the date '21.4.2020' also in blue ink.

CRAIG BRETHERTON
Manager Regional Operations – Riverina Far West Region
Environment Protection Authority

ATTACHMENT A

Potential environmental impacts of the project

The Environmental Impact Statement (EIS) must address the requirements of Section 45 of the *Protection of the Environment Operations Act 1997* (POEO Act) by determining the extent of each impact and providing sufficient information to enable the EPA to determine appropriate conditions, limits and monitoring requirements for an Environment Protection Licence (EPL).

1. The following potential environmental impacts of the project need to be assessed, quantified and reported on.
 - Energy from waste
 - Air
 - Noise
 - Water
 - Land
 - Waste and chemicals
 - Human health risk.

The EIS should address how the required environmental goals will be met for each potential impact.

2. Describe mitigation and management options that will be used to prevent, control, abate or mitigate identified potential environmental impacts associated with the project and to reduce risks to human health and prevent the degradation of the environment.

This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

Energy from Waste

The goals of the project should include the following.

- Demonstrate how the proposal would operate as an energy from waste facility in accordance with the EPA's *NSW Energy from Waste Policy Statement*;
- Demonstrate that the waste used as feedstock in the waste to energy plant would be the residual from a resource recovery process that maximises the recovery of material in accordance with the EPA's *NSW Energy from Waste Policy Statement*;
- Describe the classes and quantities of waste that would be treated at the facility, including the proposed sources, quantities, composition and classes of waste with reference to the data sets relied upon in making these determinations. Note, all waste must be classified in accordance with the EPA's *Waste Classification Guidelines*;
- Describe the procedures that would be implemented to control residual waste inputs to the plant, including contingency measures that would be implemented if inappropriate materials are identified;
- Include a detailed site plan(s) identifying all operational areas and a detailed description of the waste processing procedures at the facility, including the types of pollution which may result from the storage and processing of that waste, and mitigation measures for managing such impacts;

- Demonstrate that all waste handling activities, including receiving, sorting, processing, sampling, quarantine, storage and loading will be conducted in an enclosed building or in an area with adequate environmental controls including measures to prevent waste, dust and windblown particles leaving the premises;
- Provide details of the processing capacity of the plant including typical, maximal and minimal rates of processing;
- Provide the maximum annual throughput of waste and the maximum volume of waste to be stored at the premises at any one time;
- Include a list and description, including quantities, of the types of materials (solid, liquid or gaseous) or finished products (if any) to be produced and their intended fate;
- Describe the procedures to be implemented for the management of all waste materials produced from the waste to energy facility (solid, liquid and gaseous); and
- Include details of all procedures and protocols to be implemented to ensure that any waste accepted at and leaving from the site is transported and disposed of lawfully and does not pose a risk to human health or the environment.

Potential impacts on air quality

The goal of the project in relation to air quality should be to ensure sensitive receptors are protected from adverse impacts from pollutants and solid particulates.

The EIS for the proposal should include an Air Quality Impact Assessment (AQIA). The AQIA would need to provide details on the proposed measures to manage air emissions from all sources. Measures to prevent or control the emission of dust from the construction activities and from the bioenergy plant during operation must be detailed based on the outcome of an assessment of air emissions undertaken in accordance with the *Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in New South Wales* (DECC, 2005). All potentially impacted residential or sensitive premises likely to be impacted by the development must be identified and included in the assessment.

The EIS should identify any other existing impacts on air quality within the area and if necessary, provide an assessment and commentary on the predicted cumulative impacts that may arise.

Emissions from any plant must meet the design criteria detailed in the Protection of the Environment Operations (Clean Air) Regulation 2010. Details need to be provided on the proposed air pollution control techniques from any air emission points, including proposed measures to manage and monitor efficiency and performance.

Potential impacts on noise and vibration

The goals of the project should include design, construction, operation and maintenance of the facility in accordance with relevant EPA policy, guidelines and criteria, and in order to minimise potential impacts from noise.

Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009).

The EPA expects that potential noise sources are assessed in accordance with the *Noise Policy for Industry* (EPA 2017), and where required mitigation measures are proposed (e.g. appropriate equipment chosen to minimise noise levels). All residential or noise sensitive premises likely to be impacted by the development must be identified and included in the assessment.

The proposed development may result in an increase in traffic movements associated with the delivery of processed engineering fuel (PEF) to the premises. The number of traffic movements associated with

the proposal should be quantified and the potential noise impacts associated with these traffic movements need to be assessed in accordance with the *NSW Road Noise Policy* (DECCW, 2011).

Potential impacts on water

The goals of the project should include the following.

- No pollution of waters (including surface and groundwater), except to the extent authorised by EPA (i.e. in accordance with an Environment Protection Licence);
- Polluted water (including effluent, process waters, wash down waters, polluted stormwater or sewage) captured on the site and collected, treated and beneficially reused, where this is safe and practicable to do so; and
- It is acceptable in terms of the achievement or protection of the River Flow Objectives and Water Quality Objectives.

The EIS should document the measures that will achieve the above goals.

The EIS should provide details of any water management systems for the site to ensure surface and ground waters are protected from contaminants, including:

- Surface and groundwater conditions that may potentially be impacted by operations on site and any proposed environmental monitoring measures that the proponent will implement to monitor the receiving environment.

Potential impacts on land

The goals of the project should include the following.

- No pollution of land, except to the extent authorised by EPA (i.e. in accordance with an Environment Protection Licence); and
- The potential impact of land erosion from the development is mitigated.

The EIS should document the measures that will achieve the above goals.

Waste and chemicals

The goals of the project should include the following.

- It is in accordance with the principles of the waste hierarchy and cleaner production;
- Where potential impacts associated with the handling, processing and storage of all waste materials generated at the premises are identified, there be satisfactorily mitigated;
- The beneficial reuse of all wastes generated at the premises are maximised where it is safe and practical to do so;
- No waste disposal occurs on site except in accordance with an Environment Protection Licence; and
- Ensure that the environmental risks from hazardous chemicals and chemical waste are minimised.

Human Health Risk Assessment

A Human Health Risk Assessment (HHRA) undertaken in conjunction with the AQIA and in accordance with *Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards* (enHealth) that includes the following.

- An examination of best practice management measures for the mitigation of toxic air emissions;
- Details of the proposed technology and a demonstration that it is technically fit for purpose;

- The inhalation of criteria pollutants and exposure from all pathways i.e. inhalation, ingestion and dermal to specific air toxics;
- Details of any pollution control equipment and other impact mitigation measures for fugitive and point source emissions;
- A demonstration of how the waste to energy facility would be operated in accordance with best practice measures to manage toxic air emissions with consideration of the European Union's Waste Incineration Directive 2000 and the NSW Energy from Waste Policy Statement; and
- Details of the proposed management and monitoring measures.

Monitoring

The EIS must outline the proposed monitoring regime to be implemented in relation to the following potential impacts, where relevant.

- Waste;
- Air quality and particulate matter; and
- Operational noise.

ATTACHMENT B

<u>Title</u>	<u>Web address</u>
Relevant Legislation	
<i>Environmental Planning and Assessment Act 1979</i>	https://www.legislation.nsw.gov.au/#/view/act/1979/203
<i>Protection of the Environment Operations Act 1997</i>	https://www.legislation.nsw.gov.au/#/view/act/1997/156/full
Licensing	
Guide to Licensing	http://www.epa.nsw.gov.au/licensing/licenceguide.htm
Air Issues	
POEO (Clean Air) Regulation 2010	https://www.legislation.nsw.gov.au/#/view/regulation/2010/428/historical2016-11-01/full
Approved methods for modelling and assessment of air pollutants in NSW (2016)	http://www.environment.nsw.gov.au/resources/air/ammodelling05361.pdf
Assessment and management of odour from stationary sources in NSW (DEC, 2006)	Technical framework: https://www.environment.nsw.gov.au/resources/air/20060440framework.pdf Technical notes: https://www.environment.nsw.gov.au/resources/air/20060441notes.pdf
Noise and Vibration	
Interim Construction Noise Guidelines (EPA, 2017)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline
Noise Policy for Industry (EPA, 2017)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)
NSW Road Noise Policy (EPA, 2011)	https://www.epa.nsw.gov.au/publications/noise/2011236-nsw-road-noise-policy
Assessing Vibration: a technical guideline (DEC 2006)	https://www.epa.nsw.gov.au/noise/vibrationguide.htm
Australian and New Zealand Environment Council: Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration (ANZECC 1990)	https://www.epa.nsw.gov.au/resources/noise/ANZECBlasting.pdf

Soils	
Managing Urban Stormwater: Soils and Construction (Landcom, 2004)	https://www.environment.nsw.gov.au/stormwater/publications.htm
Waste	
Waste Classification Guidelines (EPA, 2014)	https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines
Protection of the Environment Operations (Waste) Regulation 2014	https://www.legislation.nsw.gov.au/regulations/2014-666.pdf
Environmental Guidelines: Solid Waste Landfills, Second edition (EPA, 2016)	https://www.epa.nsw.gov.au/~media/EPA/Corporate%20Site/resources/waste/solid-waste-landfill-guidelines-160259.ashx
Resource recovery orders and exemptions	https://www.epa.nsw.gov.au/wasteregulation/orders-exemptions.htm
EPA's Energy from Waste Policy Statement	http://www.epa.nsw.gov.au/wastestrategy/energy-from-waste.htm
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
National Water Quality Management Strategy: Australia and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000)	http://www.waterquality.gov.au/anz-guidelines/Documents/ANZECC-ARMCANZ-2000-guidelines-vol2.pdf
National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ, 2000)	http://www.waterquality.gov.au/anz-guidelines/Documents/ANZECC-ARMCANZ-monitoring-reporting.pdf
Using the ANZECC Guidelines and Water Quality Objectives in NSW (EPA, 2006)	https://www.epa.nsw.gov.au/~media/epa/corporate-site/resources/water/anzeccandwqos06290.pdf
Environmental Guidelines: Storage and Handling of Liquids (EPA, 2007)	https://www.epa.nsw.gov.au/licensing-and-regulation/licensing/environment-protection-licences/compliance-audit-program/chemical-storage-handling-and-spill-management/storing-and-handling-liquids-trainers-manual
The NSW State Groundwater Policy Framework Document (DLWC, 1997)	http://www.water.nsw.gov.au/_data/assets/pdf_file/0008/547550/avail_ground_nsw_state_groundwater_policy_framework_document.pdf

The NSW State Groundwater Quality Protection Policy (DLWC, 1998)	http://www.water.nsw.gov.au/__data/assets/pdf_file/0006/548286/nsw_state_groundwater_quality_policy.pdf
National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC, 1995)	https://www.water.wa.gov.au/__data/assets/pdf_file/0020/4925/8728.pdf
Human Health Risk Assessment	
Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012)	http://www.eh.org.au/documents/iten/916

Mr Chris Ritchie
Director, Industry Assessments
Department of Planning, Industry and Environment
320 Pitt Street
SYDNEY NSW 2000

Attention: Mr William Hodgkinson

Dear Mr Ritchie

Re: SEARS request MP07_0146 - MOD 5 – Bioenergy Plant, Wagga Wagga

Thank you for the opportunity to comment on the proposed modification application to construct and operate a combined heat and power plant by the Riverina Oils Integrated Oilseed Processing Plant (DA 07-0146) located at Wagga Wagga. NSW Health has reviewed the scoping paper and identified the key environmental assessment issues of significance. Air quality and human health risks are the key issues that need to be addressed. NSW Health recommends the following:

- A quantitative assessment of the potential air quality and odour impacts of the development on surrounding landowners and sensitive receptors.
- A human health risk assessment in accordance with the Environmental Health Risk Assessment: guidelines for assessing human health risks from environmental hazards (enHealth, 2012) covering inhalation of criteria pollutants and exposure (inhalation, ingestion and dermal) to specific air toxics, including impacts from transport of waste on road.
- An assessment of worst-case emissions scenarios and cumulative impacts on sensitive receptors.
- Details of the proposed technology and a demonstration that it is technically fit for purpose.
- Details of the management measures for the mitigation of toxic air emissions.

If you have any further enquiries regarding this matter, please contact Mr Tony Burns, Senior Environmental Health Officer, Murrumbidgee and Southern NSW Public Health Unit at Tony.Burns1@health.nsw.gov.au or on 02 5943 2044.

Yours sincerely



Tony Burns
Senior Environmental Health Officer
Murrumbidgee and Southern NSW LHD

29/4/2020

21/04/2020

Environmental Assessments
Department of Planning, Industry and Environment
320 Pitt Street
Sydney
NSW 2000

Attn: William Hodgkinson – Planning Officer

Re: Environmental Assessment – Application MP07_0146-Mod-5 – Riverina Oils and Bio Energy Pty Ltd

Dear William

Wagga Wagga City Council

Wagga Wagga City Council is supportive of the expansion of the Riverina Oils Integrated Oilseed Processing Plant.

Council has been closely involved in the development of a Master Plan for the Bomen Special Activation Precinct alongside the Department of Planning, Industry and Environment. The Master Plan is to guide the development of the Bomen Enterprise Area over the long term.

Development of a world-class enterprise precinct at Bomen will deliver benefits to regional development, economic diversification and employment growth in Wagga Wagga and southern New South Wales.

Investment in continued expansion of both capacity and capabilities of this and other facilities in the Bomen enterprise area is consistent with this strategic vision for the Bomen area.

This particular proposal incorporates energy recovery from waste materials to improve the long-term sustainability of operations at Riverina Oils Integrated Oilseed Processing Plant.

This demonstrates strong synergies with the underpinning principles of the Bomen Special Activation Precinct, enhancing environmental sustainability whilst also improving long-term security of economic activity in the precinct.

Yours sincerely



Tristan Kell

Manager – City Strategy