



Our Ref:DOC20/61131

Industry Assessments
Department of Planning, Infrastructure and Environment
GPO Box 39
SYDNEY NSW 2000

Att: Bianca Thornton
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23 January 2020

Dear Sir/Madam

Further Information Required – SSD-9418 - Ravensworth Composting Facility Expansion

Thank you for inviting the Environment Protection Authority (EPA) to comment on the state significant development proposal for Bettergrow Pty Ltd to expand operations at the Ravensworth Composting Facility. The EPA has reviewed the proposal on exhibition, including the Environmental Impact Statement (EIS) prepared by RPS Group dated 14 November 2019.

The EPA understands the proposal involves:

- Increasing the composting capacity of the existing facility from 76,000 tonnes per annum (tpa) to 200,000 tpa;
- The addition of new waste types (including food organics and drilling mud) into the composting waste stream;
- Upgrading existing facilities and expansion of operational areas;
- Installation of a single lane weighbridge, wash bay, 2 x 50,000 litre drill mud process water storage tanks;
- Construction of a machinery shelter and receivals shelter; and
- Commissioning of Stage 2 of the development as approved in DA140/2016.1 and DA140/2016.2 by Singleton Shire Council.

The subject site operates under Environment Protection Licence 7654 (**the Licence**), and if the proposal is approved, the licensee will need to apply for the Licence be varied to include the increase in capacity and operations. Following review of the EIS, the EPA requires further information from the proponent before determining whether the EPA can vary the Licence.

Noise

The EPA provides the following comments and recommendations for noise impacts:

- The review of the noise impact assessment indicates that due to the distance between the facility and the nearest noise sensitive receiver, there will be little to no audible noise from the development.
- As the predicted noise levels from the site are well below the project trigger noise levels, and in some cases are predicted to be inaudible, the required compliance reporting that comes along with noise conditions in a licence would largely be unnecessary.

- The EPA does note that a sleep disturbance assessment has not been undertaken for the site as “a majority of site operations takes place during the day period”. Although the night period noise emissions are likely to be well below the L_{Amax} 52 dB assessment noise level set out in the Noise Policy for Industry, the EPA notes that the noise impact assessment should contain sleep disturbance assessments whenever night time operation is expected.
- As such, there are no noise conditions recommended for the proposal to be incorporated into the Licence and no further information is requested.

Water

The EPA is satisfied with the water assessments and management plans submitted with the EIS, when applied in conjunction with existing licence conditions and requirements within the Stage 2 approvals of development consent.

Air

The EIS and Air Quality Impact Assessment (**AQIA**) does not provide the information required to consider the matters set out under section 45 of the *Protection of the Environment Operations Act 1997 (the Act)*. In particular, the AQIA does not adequately:

- Described odour mitigation and management measures.
- Benchmark odour mitigation and management measures against best practice (namely the enclosure or covering of food waste composting).
- Provided sample testing reports to verify emission rates from site sampling.
- Consider cumulative odour impacts resulting from the neighbouring compost facility.
- Assess the model generated meteorological data used in the dispersion assessment against longer-term (minimum five years) meteorological data as required in the Approved Methods.

In addition, the dust assessment has not assessed $PM_{2.5}$ and incorrectly referenced the guideline.

Detailed comments on air impacts of the proposal and the shortfalls of the AQIA are provided for the proponent at Attachment A.

Other

Further comments and recommendations from the EPA:

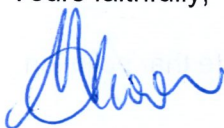
- It is recommended the proponent revise the EIS to detail the expected quantity of each waste type proposed to be accepted at the premises, including the state of the waste received (i.e. raw, screened, processed, pre-blended, partially composted etc.).
- The EPA generally requires any processing or composting of food wastes to be conducted within an enclosed space. If the applicant wishes to deviate from this standard, it will be required to provide justified alternatives that can demonstrate the same level of control gained by enclosing the operation.
- Include the categorisation of the various organic wastes proposed to be accepted (outlined in section 9.13 of the EIS).
- Details of any liquid waste (including drill mud water) proposed to be accepted at the premises. These may impact licensing activities and sampling requirements.
- Regarding the proposed use of ash at the premises, more detailed information is required regarding the source, waste classification and chemical characteristics of this waste. Table 1 of the EPA's coal ash order 2014 is recommended to be used as a basis of the chemical characterisation.

On receipt of the information requested in this letter and any submissions on the proposal, the EPA will reassess the proposal and provide Planning with further comments for consideration. If the

proposal is approved, the licensee must apply to the EPA separately to vary the Licence before any works in the proposal can commence.

If you have any questions in relation to this matter, please call me on 02 4908 6892.

Yours faithfully,



MELISSA MOORE
A/Unit Head Waste Compliance Newcastle
Environment Protection Authority

Attachment A – Comments and Recommendations for Air Impacts

Section 45 of the Act sets out matters that the EPA must consider when making licensing decisions, including:

- the pollution caused or likely to be caused by the carrying out of the activity or work concerned and the likely impact of that pollution on the environment; and
- the practical measures that could be taken to prevent, control, abate or mitigate that pollution, and to protect the environment from harm as a result of that pollution.

The EIS and AQIA do not provide the information required to consider these matters.

1. Mitigation and management measures have not been benchmarked against best practise

The EPA advises that the *Technical framework: Assessment and management of odour from stationary sources in NSW* ("Odour Technical framework") states that the odour benchmark is whether best management practises and best available technology are being used to minimise odour.

The EPA advises that best available technology for diffuse emissions such as composting includes storing, treating and handling waste and material in enclosed buildings, maintaining enclosed buildings under adequate pressure and collecting and directing emissions to an appropriate abatement system via air extraction (Best Available Techniques (BAT) Reference Document for Waste Treatment, Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control) 2018, European Commission).

The AQIA has not adequately described the mitigation and management of odour from the facility and the proposed expansion and has not benchmarked the management and technology to minimise odour against best practise.

Recommendation

The EPA recommends that the proponent consider additional measures to minimise odour and provide an assessment against best management and technology of the proposed measures.

2. Cumulative odour assessment scenario not presented

The EPA advises that the Odour Technical framework requires a cumulative odour assessment where activities with similar odour characteristics exist in the region.

The assessment has not included Loop Organics, a neighbouring composting facility, in a cumulative modelling scenario. Justification presented for the omission of a cumulative assessment scenario, including the minimal odour from Loop Organics, is not adequate.

Recommendation

The EPA recommends that the proponent provide a more robust justification for not conducting a cumulative modelling scenario for odour. Where adequately robust justification is not available, the proponent must present a cumulative odour scenario.

3. The odour emissions inventory is based on site sampling and literature values

The proponent must provide odour testing reports to validate the odour rates obtained from samples measured on site and used for odour dispersion modelling in the assessment.

Recommendation

The EPA recommends that as the odour sources are large and the compost input materials are variable, the proponent evaluate the potential variability in odour emission rates and adequately

justify the odour emission rates used in dispersion modelling as representing reasonable worst-case conditions.

4. The AQIA models odour and dust dispersion for three years but has not correlated the meteorological data used for modelling against a long-duration of at least five years

The AQIA generated and used meteorological data from models to assess dispersion of odour and dust. Only three years of meteorological data from Camberwell OEH station was provided to evaluate that the site-representative data adequately describes the expected meteorological patterns of the site.

Recommendation

The EPA recommends that the proponent must correlate the modelled meteorological data against a longer-duration site-representative meteorological data of at least five years as required in the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* ("Approved Methods").

5. PM_{2.5} not assessed and incorrectly referenced as a NEPM advisory goal

The AQIA has not assessed PM_{2.5} as it states combustion-type emission sources are more likely to contribute to impacts in the PM_{2.5} range.

The EPA advise that PM_{2.5} is now a criteria pollutant as per the Approved Methods and has 24-hour and annual impact assessment criteria of 25 µg/m³ and 8 µg/m³, respectively.

Recommendation

The EPA recommends the proponent evaluate PM_{2.5} emissions from the proposed expansion of the facility and provide an impact assessment for PM_{2.5}.