



OUT19/9844

Ania Dorocinska
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Dear Ms Dorocinska

**Baiada Oakburn Poultry Processing Plant (SSD-9394)
EIS Exhibition**

I refer to your email of 23rd July 2019 to the Department of Planning, Industry and Environment (DPIE) – Lands, Water and Department of Primary Industries (DPI) about the above matter.

The following advice for you to consider is from relevant branches of Lands & Water and DPI.

DPIE – Water and Natural Resources Access Regulator

Pre-approval Recommendations

It is recommended that, as part of the EIS, the proponent should:

- Develop a groundwater monitoring plan to manage the risk of leakage from the lagoons and resulting contamination.
- Include a map of surrounding bores and borehole logs to support the findings on groundwater (as determined in the EIS).
- Confirm the maximum annual water volumes to be accessed and the proposed water sources. Confirm the ability to access this volume e.g. via agreement with council or via purchase of water entitlement if groundwater is proposed.
 - If groundwater is required the proponent will need to assess impacts of any proposed bore on the water source and adjacent users.
- Provide confirmation by the water supply authority that the volume of water required for the proposal is adequately serviced at the proposed location.
- Reassess the storm water rainfall runoff model using the complete rainfall record.

Further detail is contained in **Attachment A**.



Post-approval Recommendations

Should the project be approved, the following is recommended:

- Preparation of an erosion and sediment control plan which refers to the guidelines, Managing Urban Stormwater: Soils and Construction (Landcom 2004) to manage sediment loads during the construction period.
- Groundwater monitoring bores be installed around the Covered Anaerobic Lagoons and a Water Management Plan be developed (in consultation with DPIE) as a condition of consent. Further detail is contained in **Attachment A**. This should also include:
 - a. An incident response plan with triggers for the National Water Quality Management Strategy (NWQMS) guidelines (ANZECC/ARMCANZ latest issue) should the lagoons be found to be leaking.
 - b. Revision of the size of the retention basins if the reassessment of the storm water rainfall runoff model shows that they are not large enough.
 - c. Undertaking adequate groundwater sampling (e.g. including routine and event based).
 - d. Scheduling of ongoing reporting in the plan.

Any further referrals to DPIE – Lands, Water and DPI can be sent by email to: landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink that reads 'Liz Rogers'.

Liz Rogers
Manager, Assessments
DPIE Water – Strategic Relations
23 August 2019

**Baiada Oakburn Poultry Processing Plant (SSD-9394)
EIS Exhibition – Additional Comments**

Water Source and Retention

It is noted that based on current estimates at full operation, the proposed Oakburn Processing Plant will consume up to 8ML per day. It is noted within the EIS, that the existing Out Street plant uses 2ML per day (which will be closed) which results in a net increase in potable water demand of 6ML per day. Given the proposed *Advanced Water Treatment Plant*, the overall water make up requirement is expected to be 2ML per day. The source and security of this volume is yet to be confirmed.

The size of the storm water retention basins do not appear to be large enough to contain all the storm water in a 1:100 year event. The model run from 16 August 1958 to 31 December 1992 is not sufficient. It does not include the storm event of 29/11/2008 where 164.2 mm of rain fell in one 24 hr period. The model appears to have only used the rainfall station that closed in 1992 and did not include the new station that commenced in 1993.

The proposed ponds for stormwater detention on minor streams are considered exempt from harvestable rights calculations, provided they are solely to prevent the contamination of a water source. If this is not the case the dams must be considered in calculating the Maximum Harvestable Right Dam Capacity.

Groundwater Monitoring

The proposal will not be extracting groundwater as part of its water requirements. Water will be sourced from the town water supply and a treatment plant shall return 75% of the water used back to the plant for reuse. The proposed treatment plant will be installing two Covered Anaerobic Lagoons to a depth of about six metres below the surface. Monitoring bores will be required to determine if the lagoons leak. Groundwater monitoring bores and a groundwater monitoring plan have not been considered in the EIS.

END ATTACHMENT A