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Attn: Helen McCarthy
Environment and Sustainability Manager
REMONDIS Australia Pty Ltd
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MASCOT NSW 2020

16 July 2022

by email: helen.mccarthy@remondis.com.au

PROPOSED TOMAGO RESOURCE RECOVERY AND TRUCK PARKING DEPOT – AIR QUALITY & ODOUR MANAGEMENT PLAN – RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Dear Helen,

As requested, the following letter provides additional clarification in relation to the site-specific air quality and odour management plan (**AQOMP**) for the proposed Resource Recovery Facility (**RRF**) and Truck Parking Depot (**TPD**) works, located at Lot 11 on DP270328, Lot 8 on DP270328 and part of Lot 301 on DP634536, 21D and 21F School Drive, Tomago, New South Wales (the **Tomago Facility**). For background and context, the Tomago Facility was accessed as a State Significant Development (**SSD**) and approved by the Minister for Planning and Public Spaces on 21 October 2021. As part of *Part B – Specific Environmental Conditions* of the development consent approval (SSD 10447), the following is required:

B36. Prior to the commencement of operation, the Applicant must prepare an Air Quality Management Plan (AQMP) for the development, to the satisfaction of the Planning Secretary. The AQMP must form part of the OEMP required by Condition C5 and must:

- (a) be prepared by a suitably qualified and experienced person(s);*
- (b) detail and rank all significant emission sources from the development;*
- (c) identify the control measures, including proactive and reactive mitigation measures that will be implemented for each emission source;*
- (d) include the following for each emission source:*
 - (i) risk assessment;*
 - (ii) key performance indicator;*
 - (iii) monitoring method;*
 - (iv) location, frequency and duration of monitoring;*
 - (v) record keeping;*
 - (vi) response mechanism and contingency measures; and*
 - (vii) compliance reporting.*

The AQOMP Version 0 was issued on 14 June 2022. A summary of how the AQOMP addresses the Request for Additional Information issued by the Department of Planning and Environment (**DPE**) in a letter dated 8 July 2022 is summarised in **Table 1**.

We trust this response letter addresses all requested matters. Please let us know if you have any further enquiries.

Yours sincerely,

The Odour Unit Pty Ltd

Michael Assal MEngSc, B. Eng (Hon)/B. Sc., AMIChemE, MIEAust, CAQP
Operations Manager

Table 1 – Response to Request for Additional Information	
DPE Request	The Odour Unit Response
Please provide a more detailed description of the main emissions sources and rankings for the development, as per condition B36 (b) of the consent	Refer to Section 2.3 and Section 2.4 to Section 2.4.6 of the AQOMP. These sections identify and characterise each significant emission sources from the Tomago Facility by providing an operational description of the process/activity. The main emission sources and their ranking is as follows (as per the Trinity Consultants Australia Report titled <i>Remondis Resource Recovery Facility, Tomago – Air Quality Verification Assessment dated 10 February 2022</i> (the AQA Verification Report): - Building 2 will be ventilated naturally through an existing ridge vent along the roof. All odour emissions from Building 2 were modelled using line-volume source on top of Building 2 to represent the ridge vent (refer to Section 2.4). - Based on the adopted odour emission rates from Building 2, the ranking of each main emission source are as follows: - Drill Mud Recycling Facility (refer to Section 2.4.1); - Packaged Food Recycling Plant (refer to Section 2.4.2); - Hazardous Waste Recycling Facility, specifically the waste oil unloading activity (refer to Section 2.4.4); and - Garden organics primary processing area (refer to Section 2.4.3).
Please provide clarification of the key performance indicators, and a justification for these, as per condition B36 (d)(ii) of the consent	Refer to Section 5 of the AQOMP. In summary, the key performance indicators include the efficacy of the odour control units installed on the food de-packaging unit and waste oil unloading as well as the overall odour emission performance of Building 2. These are documented as part of the AQA Verification Report. Based on the details in the AQA Verification Report, the key performance indicators from an odour emissions perspective are as follows: - Building 2 will be ventilated naturally through an existing ridge vent along the roof. All odour emissions from Building 2 were modelled using line-volume source on top of Building 2 to represent the ridge vent. - The adopted odour emission rates from Building 2 (total odour emissions modelled as a series of volume sources along roof ridge (8 sources over 70 metres at 12 metre height)) are as follows: - Drill mud recovery facility – 517.4 ou.m³/s; - Food de-packaging OCU – 100 ou.m³/s; - Garden organics primary processing area – 0.134 ou.m³/m²/s (over a 179 m² area, equivalent to 24 ou.m³/s); and - Total odour emissions from ridge vent – 641.4 ou.m³/s (summation of Points (a) to (c)). - Waste oil unloading – 72 ou.m³/s (modelled as point source).
Please provide a justification for air quality and odour monitoring methods, to satisfy condition B36 (d)(iii) of the consent.	Refer to Section 4 of the AQOMP. There are two key air quality and odour monitoring methods documented in the AQOMP, including: - The undertaking of field ambient odour assessment (FAOA) surveys, as outlined in Section 4.3. This is an accepted odour survey monitoring technique by the New South Wales Environment Protection Authority (NSW EPA). A FAOA survey provides a facility with the ability to define and document observed ground level odours (on-site and off-site) as well as facilitate in the determination of these odours in relation to odour character, frequency of odours observed and the odour intensity of those individual observations as a quantitative scale of measure. This will assist with an investigation into any concerns or complaints and allow for the probable source or cause to be determined so that rectification/remedial action can be undertaken, if required. - The adoption of odour diaries can assist complainants in providing details of their perception of the suspected nuisance odours and any effects that the odour has on their behaviour. The details are recorded using a standard diary record sheet on a daily or weekly basis and particularly whenever an odour episode occurs. This can provide valuable community feedback to the Tomago Facility.