

2 September 2020

Department of Planning, Industry and Environment
 GPO Box 39
 SYDNEY NSW 2001

Attention: Ania Dorocinska – ania.dorocinska@planning.nsw.gov.au

Dear Ania,

RE: BAIADA INTEGRATED POULTRY PROCESSING FACILITY (SSD 9394) – RESPONSE TO DPIE WATER AND NATURAL RESOURCES ACCESS REGULATOR

I refer to your correspondence dated 1 September 2020 regarding matters identified by the Department of Planning, Industry and Environment (DPIE) and Natural Resources Access Regulator (NRAR) relating to stormwater modelling and groundwater monitoring. A response is provided below to each of the matters raised.

MATTERS RAISED	APPLICANT'S RESPONSE
Prior to Approval	
<p><i>The proponent should reassess the storm water rainfall runoff model using the complete rainfall record and most up to date methodology.</i></p> <p><i>The rainfall-runoff modelling used to design the stormwater management infrastructure has not used the full period of available rainfall records and has not used the latest Australia Rainfall and Runoff (ARR) framework. ARR was thoroughly revised in 2016 and a digital update in 2019 – refer to this link: http://arr.ga.gov.au/home</i></p>	<p>MPN Consulting have advised that the MUSIC model has been prepared using pluviograph rainfall data from rainfall station 55054 Tamworth Airport, which only includes rainfall data from 16 August 1958 to 31 December 1992. This was the same data used to model and construct the existing stormwater management infrastructure on site associated with the replacement rendering plant DA53/97 Modification 5.</p> <p>Additional modelling using the recently revised data can be undertaken, however MPN Consulting has advised that the alternate rainfall data is unlikely to result in any fundamental changes to the layouts or the wholesale changes to the sizes of the stormwater infrastructure.</p> <p>As such it is considered, that the current modelling is fit for purpose and that DPIE include a condition of approval that revised stormwater modelling using the ARR data (as suggested) is provided prior to issue of a Construction Certificate for development on the site.</p>
<p><i>The proponent should commit to the development of a groundwater monitoring plan to manage the risk of leakage from the lagoons.</i></p> <p><i>The treatment plant will use the existing “Rendering Water Treatment Lagoon” that will deliver waste brine to three</i></p>	<p>As noted in our Response to Submissions to DPIE dated 3 July 2020 (page 36), the applicant is willing to prepare and implement a groundwater monitoring plan for the lagoons.</p>




MATTERS RAISED	APPLICANT'S RESPONSE
<p><i>new "Evaporation Ponds" that wil hold water to a depth of about 1.5 below the surface. The proponent states that the ponds will be lined and designed to eliminate any leakage. The proponent has not responded directly to the recommendation for groundwater monitoring. DPIE Water maintains the view that monitoring bores will be required to monitor impacts of any lagoon leakage.</i></p>	<p>This can be included as a condition of approval.</p>
Condition of Consent Recommendation	
<p><i>As a condition of consent groundwater monitoring bores should be installed around the three new Evaporation Basins and the Existing Rendering Water Treatment Lagoon and a Water Management Plan be developed in consultation with DPIE; This is to also include:</i></p> <ul style="list-style-type: none"> - <i>An incident response plan with triggers for the National Water Quality Management Strategy (NWQMS) guideliens (ANZECC/ARMCANZ latest issue) should the lagoons be found to be leaking.</i> - <i>Adequate groundwater sampling is undertaken (e.g. including routine and event based).</i> - <i>Ongoing reporting is scheduled in the plan.</i> 	<p>As noted in our Response to Submissions to DPIE dated 3 July 2020 (page 36), the applicant is willing to prepare and implement a groundwater monitoring plan for waste water treatment facility, including groundwater monitoring bores. This can be included as a condition of approval.</p>

I trust this information provides a full response to the matters raised by DPIE regarding the Hazards. Please do not hesitate to contact either myself or Nicole Boulton on telephone number (07) 3220 0288 should you have any questions or wish to discuss.

Regards,



David Ireland
 Director - Planning
 PSA Consulting (Australia) Pty Ltd

VERSION	DATE	DETAILS	AUTHOR	AUTHORISATION
V1	2 September 2020	FINAL	Nicole Boulton	 David Ireland