

Bindaree Beef Biodigester and Rendering Plant – SSD 6093

After reviewing the EIS and supporting documentation, I would like make the following comments on the proposal:

1) The odour assessment excludes one of the closest sensitive receptors

The odour assessment does not include the house at 7218 Gwydir Highway as a sensitive receptor. The house lies approximately 800m from the abattoir and therefore it should be included as a sensitive receptor.

2) Local meteorological data should be used in the dispersion modelling

Historic and current meteorological data exists for the Inverell region at the Inverell Comparison and Inverell Raglan Street meteorological stations. This includes data on wind speed and direction. Local meteorological data should be used in the assessment to ensure it is accurate and site representative.

Further, the dispersion modelling should only use meteorological data during the sensitive day time period. Using data outside the sensitive daytime period distorts the accuracy of the dispersion modelling.

3) The proposal lacks justification for the retention of the existing coal fired boiler

The existing coal fired boiler to be retained relies on old technology and is a source of emissions and odours. The proposal does not provide a compelling reason why the old coal fired boiler system should be retained. Should the coal fired boiler be retained it should be used for emergency purposes only and phased out over a reasonable time period.

4) The proposal lacks consideration of alternative odour controls

The proposal lacks consideration of alternative odour control devices such as incineration and operating the biofilter in combination with wet scrubbers to minimise odour impacts.

5) The biofilter requires careful ongoing management

The effectiveness of a biofilter to remove odours relies on a number of factors including the media, the air flow rate and moisture content. The biofilter must therefore be carefully managed to ensure reliable operation. The operator should be required to carefully monitor the performance of the biofilter's ability to remove odours and make necessary adjustment to continually improve its performance.

Further, all ventilated odours from the rendering plant should be directed to the biofilter for treatment.

6) The plant should operate under contemporary operating conditions for managing odours

An Odour Management Plan should be implemented for the ongoing operation of the abattoir. This would ensure surrounding residents are not subjected to unacceptable odour impacts or incidents that could be avoided with careful management.

An independent odour audit should also be undertaken for the facility when the odour control devices become operational and annually thereafter. This should identify any unacceptable and/or additional sources of odour and identify measures to minimise unacceptable odour impacts.

Ongoing verification of the predicted odour impacts would also be required to ensure the odour control devices are operating effectively and as predicted.