

## Sally Munk

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**From:** Rebecca Scrivener  
**Sent:** Wednesday, 2 February 2022 3:20 PM  
**To:** Sally Munk  
**Subject:** HPE CM: EPA advice regarding Air Quality Impact Assessment for Rushes Creek Poultry - Mod 3 - SSD 7704 - 02 Feb 2022

**Record Number:** DOC2022/0071762

Hi Sally,

Regarding your query on the adequacy of the air quality impact assessment for the Rushes Creek Mod 3 – SSD 7704, the following comments are provided.

I note the modification application, in summary, is for:

- Amendments to locations for ancillary infrastructure items at Farm 2;
- Additional emergency standby generator capacity and 2000L diesel storage tank; and
- Concurrent construction and operation at Farm 2 for 10 months to enable some operational capacity to commence

Acknowledging the AQIA assessment utilises onsite data collected 2019 and that this data is influenced by bushfires and drought, the air quality criteria will still be met and it should be considered to be a conservative assessment. Dust mitigation measures remain appropriate and can be increased in intensity if needed and are addressed by existing GTA/EPL conditions.

Regarding the operation of the diesel generators, the modelled scenario was for the generators to be operating continuously for a year. I note that the actual operation of the 2x440kVA generators at Farm 2 will be for a period of 10 months and the annual average predicted exceedances for PM10 (Table 5-2 of Appendix C) are very minor (<1ug/m3), the impact is extremely low. Similarly the maximum 24hr average PM10 concentrations are all well below criteria. At the completion of the 10 mth period, these generators will become emergency standby generators.

The primary concern with diesel generators is the emission of NOx. I note the predicted ground level NOx concentrations are all below concentration limits specified in the Protection of the Environment Operations (Clean Air) Regulation 2021 as well as criteria within the Approved Methods document.

Schedule 4 and Clause 59 of the POEO Clean Air Reg would apply to the proposal should it be approved. Specifically, Clause 59 provides an exemption for emergency plant for electricity generation from the limits specified in Schedule 4, provided the plant (ie generator) operates for less than 200 hours per year – this would be applicable to the standby 45kVA generator for the Namoi River waste supply pump, assuming it operates for less than 200 hrs per year. For the generators proposed for use at Farm 2, I would assume they would be operating for more than 200 hrs over the 10 months, so NOx limits within Schedule 4 will apply.

I suggest the following condition, or something similar, be included in any modification approval.

Any diesel generator that operates for 200 hours or more per year must comply with the NOx emission limits specified in Schedule 4 of the POEO (Clean Air) Regulation 2021.

This advice should be considered with our previous letter dated 31 Jan 2022. I trust this is helpful.

If you wish to discuss anything further, please contact me on my mobile or via return email.

Regards,

**Rebecca Scrivener**

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