



DOC16/492220-08:PB
DA-318-12-2014 MOD 3

Ms Kerry Hamann
Senior Planner
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Hamann

**Allied Mills Pty Limited – Section 75W Application to Modify
Development Consent DA-318-12-2014 MOD 3**

I am writing in response to your email dated 28 September 2016 to the Environment Protection Authority (EPA) inviting comments on the above modification relating to the wastewater management facility on the site.

The EPA provides the following comments to assist the Department of Planning and Environment (DPE) in the assessment and determination of this modification.

- The EPA has in the past recommended to Allied Mills the use of the Environmental Guidelines: *Use of Effluent by Irrigation* (DEC, 2004) to help inform the upgraded sewage management system installed in 2007. This DEC guideline can be accessed on the EPA website at: <http://www.epa.nsw.gov.au/resources/epa/effguide.pdf>. Further information should be provided to clearly demonstrate that the design, installation, operation and maintenance of the wastewater system will satisfy the environmental performance objectives of this guideline. This includes but is not limited to the following;
 - i. An assessment of site suitability/constraints for wastewater management. The DEC guideline includes a suggested checklist for establishing an effluent irrigation system.
 - ii. The original development appears to have included a 10,000 square metre (m²) irrigation area. The current system includes a 1,270 m² area (nitrogen limited). The design basis and model used for the hydraulic sizing of the irrigation area is unclear. A water balance has been provided in modification application (Appendix 1) based on a 900 m² area. This appears to rely on soil porosity to dispose of wastewater. In general, the quantity of wastewater applied to the utilisation area should not exceed the capacity of the area to effectively utilise the wastewater. Effluent application must not occur in a manner that causes surface runoff.
 - iii. No wet weather storage has been proposed in the current proposal. A facility for storing effluent generated is recommended when the use of effluent for irrigation is not possible, such as when it is raining, or when evapotranspiration is very low. The original development appears to have included a 100 kilolitre storage tank. The Environment & Health Protection Guidelines: *On-site Sewage Management for Single Households* (Department of Local

Government; et al, 1998) also appear to be referred to in the modification application (Appendix 3 - Council consent). This guideline recommends a minimum storage capacity of three days. This guideline can be accessed at the following website:
<https://www.olg.nsw.gov.au/sites/default/files/Onsite-sewage-management-guide.pdf>.

- Further information should be provided on the availability of a connection to town sewerage (for example, Picton Sewage Treatment Plant). This should include approximate distance to nearest feasible connection point and potential for future connection (if any).
- The Allied Mills premises is regulated by the EPA under Environment Protection Licence (EPL) Number 12498. Allied Mills must ensure compliance with this EPL and the *Protection of the Environment Operations Act 1997* (and any associated regulations) at all times.
- The existing project approval includes a requirement for an independent audit within one year of commencing operations (and then every three years). The original consent was issued on August 2005. The findings of these audits should be used to help inform the determination of this modification. This includes assessing the current level of compliance and any measures/actions to improve environmental performance.

The EPA may have further comments upon receipt and review of any further information provided in relation to the modification.

Please contact the officer if you have any questions regarding the above.

Yours sincerely



05/10/16

PETER BLOEM
Manager Illawarra
Environment Protection Authority

Contact officer: MATT FULLER
(02) 4224 4100