



PCU074815

Attention:

Director: Industry Assessments
Dept. of Planning & Environment
G PO Box 39
Sydney, NSW 2001

Wed 30th May 2018

113 Church Street

Windsor South

NSW 2756

Re [REDACTED]

Mr William Andrew SNEDDON
(NSW Chemistry Certificate
(Bch Appl Science (Food Technology))

Submission to:

Exhibition of Modification Request
ELF Mushroom Farm & Substrate Plant

Application No:- CP 08 0255 MOD 3 & MP 08 0255 MOD 3

Location: 108 Mulgrave Road, Mulgrave
(Lot 14 SP 1138749 & Part Lot 13 DP 1138749)

Proposed: ELF Farm Supplies Pty Ltd

Council Area: Hawkesbury.

Approval Authority: Minister for Planning.

Department of Planning
Received

4 JUN 2018

Scanning Room

I wish to make the following Submissions, (in no specific order) 2/4

(1) Bale storage Area Modifications

As EHF now identify Australian Practice for Straw BALE STORAGE is open Air, the request to Delete shading appears reasonable.

The Associate request to level straw storage area and amended works & walls in consequence appear acceptable, with the modified Straw Water drainage.

(2) The Extracted Natural Material imported to fill the Straw Bale Storage area NEEDS individual load certificates to ensure all imported material is of suitable standard, meeting all EPA Standards.

(3) Request for Modifications to allow continued use of Tree Canopies appears reasonable.

I see benefit on site Beyond Visual site Screening as with Bi-filter discharge at low level trees will -

- in part act to modify discharged odours on site
- Increase Air turbulence with winds blowing across the site, hence increasing Bi-filter discharge gases mixing with ambient breezes, diluting gases and odours better than a bare open site would generate.

(4) Sulphuric Acid.

Finally, there is provided detail regarding acid storage details for the 6 Ammonia Scrubbers — I've been asking RHF staff for details in the Hazard report for 4 years, to no avail until the MOD 3 Submission details — these should have been in the initial development details.

Sulphuric Acid (contd)

The details for 70% acid storage & handling appear Appropriate. However Nil detail is given on strength Acid (% Molarity, Normality) in the Ammonia scrubbers - WHY NO Detail?

Work place Safety & Education Details have also been Nil in 4 years.

Whilst a Common Industrial Material, H_2SO_4 50% solutions will be NEW at RHF and NEEDS workplace training for staff not trained in its use.

Even weak Sulphuric Acid Solutions can become hazardous if allowed to CONCENTRATE by evaporation of water if not carefully handled and disposed of.

(4) In the Documents at Council (Hawkesbury) I failed to find Detail on:-

"Modify its concept plan approval to allow components of the facility to operate in the RUL Rural Primary Production Small lots Zone".

as in my advisory letter.

If this is to rationalise operations in relation to land titles, it would seem reasonable, PROVIDING that the proposal does not reduce rating or referral to local & state government from the LARGE Industrial operation, the Base of the RHF TOLSON Vertically integrated Mushroom Growing & Sales operation.

(5) Community Oversight. 4/4

I have advice that as the Compost Plant is STATE SIGNIFICANT, a community oversight group should continue in relation to the site.

I submit the Community Oversight Process should continue, as previously.

I was on the First Committee as a community member and found the process very useful, even though the plant construction was delayed.

Following a new Community oversight group being constituted, I would like to see, at new works start up:

- Offer of site tours to previous committee members — to see results from the 2 years consultation process & some finality to their service on the committee process.

- Offer of site tours to other interested community members to see the new works and the new pollution reduction equipment (Scrubbers & Biofilters) working on the site.

as promised. Openness to community will hopefully demonstrate Odour reduction is working

ON THE SITE

B Juddor