



Tarago and District Progress Association Inc.

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Modification Request to Woodlawn Bioreactor site (MP_100012 MOD1 and DA Q91/00233 MOD2)

The Tarago and District Progress Association (TADPAI) thanks you for providing the opportunity to comment on this Development Application Modification request.

We object to the proposal.

We request before the Modification Application is approved that:

- Veolia Environmental Services resolve the issues described below to the satisfaction of the community; and
- additional conditions be applied to the operating licence.

Below are the issues identified as arising from the modification proposal.

Odour

TADPAI believed that odour management was improving during 2014 and the first half of 2015. Our views were based upon community feedback on the frequency and intensity of odour incidents.

In the later part of 2015, the number of reports of high intensity odour being experienced in the Tarago village substantially escalated. These incidents have been reported to Veolia but no satisfactory resolution has been presented to TADPAI.

TADPAI met with Veolia to discuss persistent high intensity and more frequent odour escape on 8 December 2015. Veolia told a meeting of the Association that gas capture had decreased in the latter part of 2015 but they did not have a plan for reducing the incidents of odour escape. They explained that the company was waiting for a report to be produced that would serve as the basis for future action. They further indicated that the report would be provided in early January 2016. TADPAI has had no further contact from Veolia following that meeting.

Veolia did not inform TADPAI that they had reduced leachate extraction from the mine void as mentioned on page 10 of their application. They have been advising community residents since the leachate dams were cleaned and the leachate system improved that the main problem with odour escape is excess leachate in the mine void. The action to conserve space in the ED3N pond may have been contributing to our issues over the previous six months. Let me stress: Veolia did not mention the reduction in leachate extraction or this development application in our meeting on 8 December 2015.

TADPAI have a representative on the Veolia Liaison Committee (VLC), and our representative has no recollection of being informed of any intention to modify the development application.

Veolia have indicated in section 5.5.1 that there has been a slightly higher rate of odour emissions in the ED3N ponds. Examination of Table 5.2 supporting this assertion shows the following increases by percentage.

Location	Increase in the odour emission rate
ED3N-1	663% (104 in 2014 to 794 in 2015)
ED3N-2	118% (365 in 2014 to 797 in 2015)
ED3N-3	180% (178 in 2014 to 500 in 2015)
ED3N-4	1,069% (575 in 2014 to 6,724 in 2015)

The projected odour emission rate for the proposed ED3S system is 18,710. This rate of odour emission is a 112% increase on the existing ED3N system. Veolia and The Odour Unit have not identified the reason for the increase in odour emissions from the existing ED3N system for 2015. Consequently, TADPAI is deeply concerned that the proposed figures will be vary significantly as the company cannot identify the factors that have caused the increase for 2015.

Section 5.5.2 discusses findings of the 2015 Odour Audit. The document was to be made available to TADPAI at the end of 2015. As yet, it has not been provided to us.

Figures taken from the 2015 Odour Audit in this application for modification, indicate that emissions from the active tipping face are at 45,100 ou.m3/s, and according to the document are one sixth of the predicted figure from the original Environmental Assessment. The original Environmental Assessment also predicted that no odour would leave the Bioreactor site. We have 10 years of experience to show that the predictions presented in the original Environmental Assessment were wrong.

The fact that odour measurement from the active face in 2015 is less than that predicted before the bioreactor began operation is not an indicator that odour emissions are at an acceptable level. Comparing odour emissions from the leachate evaporation dams to that of the active face, leaves the community with the conclusion that the proposed change will cause additional problems with odour.

Alternatives and Options Considered

Veolia have mentioned number of options and state that their preferred option has the least environmental impact without explaining the environmental and financial impacts of the alternatives. TADPAI wishes to examine all alternatives in far more detail than has been presented in this application.

Stakeholder Consultation

Veolia has consulted with NSW Department of Planning, and the EPA regarding this proposed change, but have not consulted with the local community directly, or through TADPAI or through the Veolia Liaison Committee. The actions of Veolia in attempting to mitigate the problem that they are attempting to address through this Development Application modification request has had a severe impact on the neighbouring community.

Water Balance Report for the proposed amendment

Section 1.3 discusses leachate build up in the landfill as though it is a potential environmental problem and gas capture issue, but owing to the decision to reduce leachate extraction, this potential risk has been realised. The community have been reporting incidents of high intensity odour escape.

Section 2.3 states that the Annual Environmental Management Report was provided to the Community Liaison Committee. The VLC don't appear to be passing these reports on to the community, so we would like copies of the report to be passed on to TADPAI. We would also like an explanation about the absence of reports between 2007 and 2011

Section 9.1 suggests that the proposed solution of using ED3S as a leachate evaporation dam has the potential to fill ED3S within 2 years, therefore this proposal does not appear to be a long term solution.

Appendix C – Odour Assessment

The far-field assessment conducted by The Odour Unit for the 2015 Odour Audit suggests that Tarago is at some distance from the bioreactor. This is not the case. The township is 6 kms by road from the site and has recently experienced a large number of odour escape incidents of high intensity. TADPAI reported to Veolia in the December 2015 meeting, that odour from the bioreactor had been reported from Glenoval Rd Lake Bathurst, more than 14 kms away from the bioreactor. The information documented by The Odour Unit in their personal assessment is very different from the experience of people actually residing in and around Tarago.

TADPAI have assisted Veolia in the implementation of Odour Diaries. The diaries have been completed by locals for approximately 15 months. None of the information provided in the Odour Diaries has been included in the Odour Assessment, instead The Odour Unit preferred to use a personal assessment. TADPAI would like to be furnished with the details of this personal assessment. What method was used and when did the assessment occur (including dates and times of assessment).

Issues to be resolved prior to assessment of the application

TADPAI request a meeting with Veolia to examine a timeline of changes to operations over the last year and details of all odour incident reports so that we can identify the factors causing the ongoing odour escape.

The identified issues are to be resolved to the satisfaction of TADPAI before approval of this modification request occurs.

TADPAI be provided with a copy of the Odour Audit for 2015, and following review, a meeting with The Odour Unit to discuss the findings in the report.

TADPAI be provided with details of all odour incidents reported to Veolia within the last 2 Years (TADPAI have previously requested that copies of odour diaries be returned to the community members who lodged the reports, but to date that request has not been fulfilled).

Veolia to provide copies of the Annual Environmental Report for years 2006 to 2014 to TADPAI for review

TADPAI to be provided with details of the personal assessment conducted by The Odour Unit, including method, dates and times of assessment.

TADPAI to be provided with copies of the Annual Environmental Management Report from 2006 to 2014.

Conditions to be added to the Bioreactor Operating Licence

1. Veolia to meet with TADPAI on a regular basis, no less than every 3 months to review reported odour incidents, incident resolution, gas capture details and proposed changes in bioreactor operations.
2. A review process be established to ensure adequate resolution of all odour incidents with support of the EPA.
3. No untreated leachate is to be stored anywhere other than within the mine void.
4. No reduction to the agreed leachate extraction and treatment rate without approval of the EPA and TADPAI.

In Summary

TADPAI has been deeply disappointed by the lack of consultation with the company on a number of issues. We are concerned that Veolia have chosen the lowest cost option to restore gas capture levels, and therefore revenue, without providing any assurance that they fully understand the current odour emissions issue or that they have a comprehensive plan to deal with present problems let alone future challenges.