



OUT15/31641

Ms Sally Munk
Infrastructure and Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Sally.Munk@planning.nsw.gov.au

Dear Ms Munk,

**Deniliquin Ethanol Plant (SSD 13_6281)
Response to exhibition of Environmental Impact Statement**

I refer to your email dated 8 October 2015 requesting advice from the Department of Primary Industries (DPI) in respect to the above matter.

Comment by DPI Water

DPI Water has reviewed the EIS associated with the proposed ethanol plant near Deniliquin in southern NSW, and provides the following comments.

- The EIS indicates construction of the project will require 34ML, and the commissioning phase will require approximately 148ML. This is to be sourced from the Deniliquin Council Water Supply via a new water pipeline, with the water supply for commissioning to be delivered over a period of three months.
- The EIS indicates normal operation of the project will require 2.6ML/d. 1.2ML/d is to be sourced from Deniliquin Council and 1.4ML/d from the proposed on-site wastewater treatment plant. The wastewater treatment plant is predicted to recycle 98% of the wastewater which is then required to provide 52% of the water demands.
- The water demands for the project are therefore reliant on Deniliquin Council's ability to supply a secure daily volume of 1.3ML/d and the 98% operating efficiency of the wastewater treatment plant. Table 6.6 indicates the potential in a severe drought for Council to be unable to provide sufficient water to all users. This indicates a potential risk to the project and increases the likelihood of the proposal to seek alternate water supplies such as groundwater during drought conditions. At this stage the proponent has removed accessing groundwater from the proposal. Not having a secure water supply for all climatic conditions represents a commercial risk to the project.

- It is recognised effluent irrigation is not proposed and the on-site wastewater system is to be concrete lined to mitigate impacts to groundwater. Monitoring and management to maintain the proposed impermeability of the concrete lining is recommended.
- The proponent does not require any licences and/or approvals under the *Water Management Act 2000* for the construction or operation of the proposed ethanol plant as outlined in the supporting documentation. If in the future any additional water is sourced from an alternative source (e.g. groundwater) then the proponent should contact DPI Water to determine if any licences and/or approvals are required.

Should you require further information please contact Tim Smith, Senior Water Regulation Officer on 02 6229 7307 or at tim.smith@dpi.nsw.gov.au.

Yours sincerely



Mitchell Isaacs
Director, Planning Policy & Assessment Advice
11/11/2015