

1st October 2010

Waterview
86 Dunns Road
PO Box 440
Wagga Wagga
NSW 2650

Dear Sir / Madam,

Riverina Oils and BioEnergy - Wagga Wagga

This is a submission regarding the above Development Application amendment.

This response is written on behalf of myself and the Eunony Valley Association Incorporated (EVA). EVA is an organisation that has 100 members that have united to a single voice to present our concerns over social and environmental issues that effect our community.

We object to the above amendment on 2 core base points. Firstly the lack of recognition of the Wagga Wagga City Council's own Local Environment Plan and secondly inaccuracy of data and failure to calculate full operating issues.

The WWCC L.E.P. states that there is to be no development on ridge lines – why is this site being considered for this project at all and in particular that it is now asking for buildings to be as high as 29metres above the ridge line. The proposed site overlooks the Eunony Valley to the east. This is an area of mixed farming and 40hectare lifestyle properties that will have their skyline damaged permanently by this proposal.

* There is ample land elsewhere zoned industrial that will bring it below visual damage levels that the ridgeline magnifies.

The inaccuracies or assumptions that are very concerning include the following points.

Water use, recycling, run-off and irrigation management.

The first proposal stated that ROBE would use 175megalitres (ML) of water, there is no mention of using less in the DA, however it now says it will only use 125ML with no mention of how or why the reduction. The 40ML storage dam will hold 1/4 to 1/3 of the annual usage levels. There is no calculation of the hard surface run-off and how that is going to be dealt with. Based on Wagga's annual average rainfall of 566.1mm the 7 hectares of developed area (could be as high as 16 hectares depending on how the balance of the site is managed) would create run-off as calculated below.



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The area multiplied by the annual rainfall of 566.1mm would create 39,620,000litres or 39ML of run-off. In February 2010 Wagga received 170mm in 1 day, this alone would have created 11.9ML run-off from the site. The proposed dam size actually only manages the on site catchment not the excess water from the plant. We strongly believe that storage the dam needs to cater for 100% of 6 months of wastewater plus the annual rainfall equivalent in on site run-off plus there needs to be buffer for the 1 in 100 year rain event i.e. this would equate to a 200ML storage dam. This would allow for rain events that eliminate the need for irrigation such as February this year.

The irrigation requirements are not calculated accurately. Considering Wagga's winter rainfall pattern and reliability there is no economic benefit to irrigate between May and October, irrigating in winter would actually create immediate run-off most years. This leaves a 6 month window of opportunity to irrigate.

There is 25 hectares proposed to be irrigated. This is on sloping land that will create run-off. The site is in the extreme SE corner of land owned by RIVCO (who is leasing the area to ROBE). Any run-off will go into the neighbour's property as there is no catchment plan for excess run-off. It is a requirement that all water tailings (run-off from irrigation) has to be controlled, collected and recycled; there is no plan of this.

This run-off and any overflow from the storage dam will run into Schiller's Creek and onto the wetlands area known as Kurrajong Plain. In the event of flooding this water course flows into the Murrumbidgee River – are you comfortable that there will be no contamination risk? The Kurrajong Plain is also a natural point for recharging the artesian aquifer from which Wagga draws its domestic supply.

The current year to date rainfall for Wagga is 655mm (annual average is YTD 477mm). That rain has fallen from February to September and the irrigation requirements over that period have minimal if any. The owners of RIVCO (who are to operate the irrigation area) have been bogged at least twice this year in their adjoining farming land due to the wetter (normal) season. On the 2010 weather there needs to be storage of 46ML (from run-off) plus 80ML of waste water from the ROBE processing. These figures do not account for the other 11 hectares of land on the ROBE site and water management from this or any other run-off nor excessive use through the plant.

** This demonstrates how flawed the modeling is for the storage dam alone.*



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Wagga Wagga Long-term Averages

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
Mean Max. (°C)	31.6	30.8	27.7	22.4	17.3	13.8	12.6	14.5	17.6	21.4	25.6	29.4	22.1
Mean Min. (°C)	16.2	16.3	13.3	9.1	5.9	3.7	2.7	3.6	5.1	7.7	10.7	13.7	9.0
Mean Rain (mm)	40.6	39.5	40.2	41.6	51.5	49.7	55.3	51.4	49.8	58.2	44.0	44.4	566.1
Mean Rain Days	5.2	5.2	5.3	6.7	9.4	11.4	13.6	13.1	10.8	9.7	7.6	6.2	104.3

Wagga Wagga Daily Records

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
High Max. (°C)	44.8	44.6	39.5	35.4	27.4	23.2	23.2	26.6	31.8	36.3	42.8	43.2	44.8
Low Max. (°C)	15.2	13.4	14.1	9.7	6.6	5.6	3.4	7.3	8.8	10.2	11.6	13.6	3.4
High Min. (°C)	29.5	28.6	24.5	21.7	17.8	13.8	14.8	14.4	16.5	21.9	27.6	29.8	29.8
Low Min. (°C)	3.4	2.3	2.6	-2.1	-4.4	-5.2	-6.3	-5.4	-3.8	-2.0	-0.2	3.4	-6.3
High Rain (mm)	91.8	69.1	104.1	78.0	91.2	50.2	46.0	44.4	49.8	55.8	51.6	65.2	104.1

Wagga Wagga Monthly Records

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
High. Max. (°C)	36.0	35.2	31.2	27.3	20.1	17.5	15.1	19.0	21.6	26.4	30.8	32.7	36.0
Low. Max. (°C)	27.5	27.4	23.6	19.3	13.9	11.8	10.8	12.4	14.2	17.8	21.0	25.8	10.8
High. Min. (°C)	20.0	20.5	16.5	12.5	9.6	8.0	5.1	5.9	7.6	10.5	14.7	17.6	20.5
Low. Min. (°C)	12.2	13.0	9.4	5.4	1.7	1.1	-1.7	1.0	2.6	5.3	5.9	9.3	-1.7
High Rain (mm)	174.4	157.5	249.2	216.9	190.3	138.8	130.0	101.4	128.0	181.7	142.4	213.4	249.2
Low Rain (mm)	0.0	0.0	0.0	0.5	4.6	0.8	1.8	6.4	4.1	0.6	0.0	0.5	0.0

Wagga Wagga Average Number of Days With Temperatures

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Ann
≥ 40°C	1.3	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.4	2.1
≥ 35°C	7.5	4.9	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	1.5	4.2	19.6
≥ 30°C	19.5	16.4	8.7	0.6	0.0	0.0	0.0	0.0	0.0	1.3	5.9	14.2	66.9
≤ 2°C	0.0	0.0	0.0	1.0	6.0	10.7	14.0	11.1	7.1	2.3	0.3	0.0	52.4
≤ 0°C	0.0	0.0	0.0	0.1	2.1	5.0	7.6	5.3	2.1	0.3	0.0	0.0	22.4

WAGGA WAGGA AMO

35.1583°S 147.4573°E 212m AMSL

Commenced 1941

Rainfall records: 67.5 years between 1941 and 2009

Min. temperature records: 67.1 years between 1942 and 2009

Max. temperature records: 67.1 years between 1942 and 2009



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The irrigation system, crop selection and water use efficiency are also inaccurate.

The irrigation area I believe needs to be owned by ROBE so that there is absolute security of agreement to irrigate. What happens if RIVCO terminate the lease or sell the land and the in-coming owner does not want the responsibility and obligation?

The 25 hectares set aside for irrigation is not large enough for responsible use of this precious commodity. As demonstrated early in this document if the dam is full at the end of winter and there is 0.3ML being added per day from the plant plus the on-going annual rainfall, there is an absolute minimum of 200ML that needs to be used over summer. On 25 hectares that would be an average of 8ML per hectare. Rice is one of Australia's thirstiest crops and that uses 8ML per hectare. The crops nominated require 2 – 4 ML per hectare for economic production levels.

** The area nominated for irrigation is a major flaw, highlighting the lack of integrity in the document as well as the blatant misuse of this precious resource.*

The irrigation system is stated to have a capacity of 0.9ML per day. With the dam full at the start of the irrigation season (and being topped up by 0.3ML per day from the plant) the irrigation system needs to be able to empty the dam by April each year, so there needs to be 2.5ML per day irrigated (for all of Summer) not the 0.9ML as stated.

- *Another glaring oversight that cannot be signed off on.*

The concept of having food producing irrigation land in the middle of a land bank zoned industrial has to be hypocritical when it comes food safety. The irrigation land is on the low side of contour and any run-off from other sites above will impact on the proposed irrigation site. Once again, a major fault in this submission.

Water is a precious resource and no more so than in the Murray Darling Basin in which this proposal is situated. The Murray – Darling Basin report due out 8/10/10 appears to be reducing irrigators entitlements by 27% – 37%. If this is so, surely ROBE must show “state of the art” systems that minimize water use through the plant and maximize production through the irrigation area. To use the water at all is questionable however to abuse the water is deplorable.

The social impact statements in regard to the community are minimalistic and flawed. Firstly the Receptor locations do not cover the 360degrees affected by this project. I am a landholder within 3km of the site and yet my property is not marked on the various maps covering Odour, Noise, Dust or Lighting. There are several other properties that have not been identified or recognized in this report either. See attached maps showing the residences that we are aware of within 6km of the proposed site.

Map of community directly impacted by ROBE DA

Red dots refer to individual residences, the lined blocks are suburbs. The “A” is the proposed site and is the highest point in the immediate district.

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Solvents are mentioned in 6.4.2 and fire risk, yet as adjoining landholders on the prevailing wind side there is no fire prevention plan.

Following a call to the Bureau of Meteorology at Wagga, it has been confirmed that the prevailing winds come from the North East to North to West to South Westerly direction. The maps supplied in the DA do not show this. The predominate winds will blow noise, dust and pollutants towards many homes and these issues will not stop at a 4.5km point.

Of the crops anticipated to be processed by ROBE only Canola is grown to a significant commercial level within 500km of Wagga. What carbon footprint would be created by transporting the other crops to this site? *Palm Oil to Wagga?*

Why is there not a major vegetation plan enforced to screen this ugly bulky mess (regardless of site location).

Why does the site need to operate 24 hours a day / 7 days a week?

I request to see a thorough working model showing that 79 people will be permanently employed, with technology enhancements and mechanisation I do not believe that 79 people are required nor would be it be economically viable to employ this many.

Is the NSW State Planning Department aware RIVCO (the irrigation partner) owns land adjoining ROBE that is severely contaminated with heavy metals and toxic waste from previous wool scouring operations? It is the same company that owns the site previously operated by Laminex (3km south of the ROBE site) that one of the Directors informed us has “thousands of tonnes of sanderdust that has similar health concerns as Asbestos Fibre, but no-one has made us do anything with it.”

Surely a responsible Government would expect a developer to have an environmentally sound operation prior to being granted additional approval for questionable activities.

The initial proposal was based on Bio-Diesel, as the demand for that has diminished so has the plan changed. Can you and I be assured that this won't become a white elephant that will scar our sky-line for years to come?

Summary:

I hold a Graduate Diploma in Agribusiness, have an agronomic background and licensed Stock & Station Agent, and have been a past member of the Wagga Wagga City Council Economic Development Committee. This proposal breaches the local planning act and has quite blatantly submitted data that is both thin on detail and limited in accuracy.



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For the New South Wales government to support this application it would negligent in its obligations to the tax payers of this State as well as the rate payers of Wagga.

I look forward to further discussion of this matter. I can be contacted on 0407 932 124.

Regards

Bill Schulz

On behalf of myself and the Eunony Valley Association Inc.



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