

ASSESSMENT REPORT

RIVERINA OILS – INTEGRATED OILSEED PROCESSING PLANT MP 07_0146 MOD 2

1. INTRODUCTION

This report is an assessment of a request to modify Project Approval MP07_0146 for the Riverina Oils Integrated Oilseed Processing Plant at 177 Trahairs Road, Bomen, in the Wagga Wagga Local Government Area. The request has been lodged by Riverina Oils and Bio Energy Pty Ltd (ROBE) pursuant to section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It seeks approval to increase production rate at the facility.

2. SUBJECT SITE

The subject site is located at 177 Trahairs Road, approximately 10 kilometres north of Wagga Wagga, in the Riverina Region of Southern NSW (**Figure 1**).

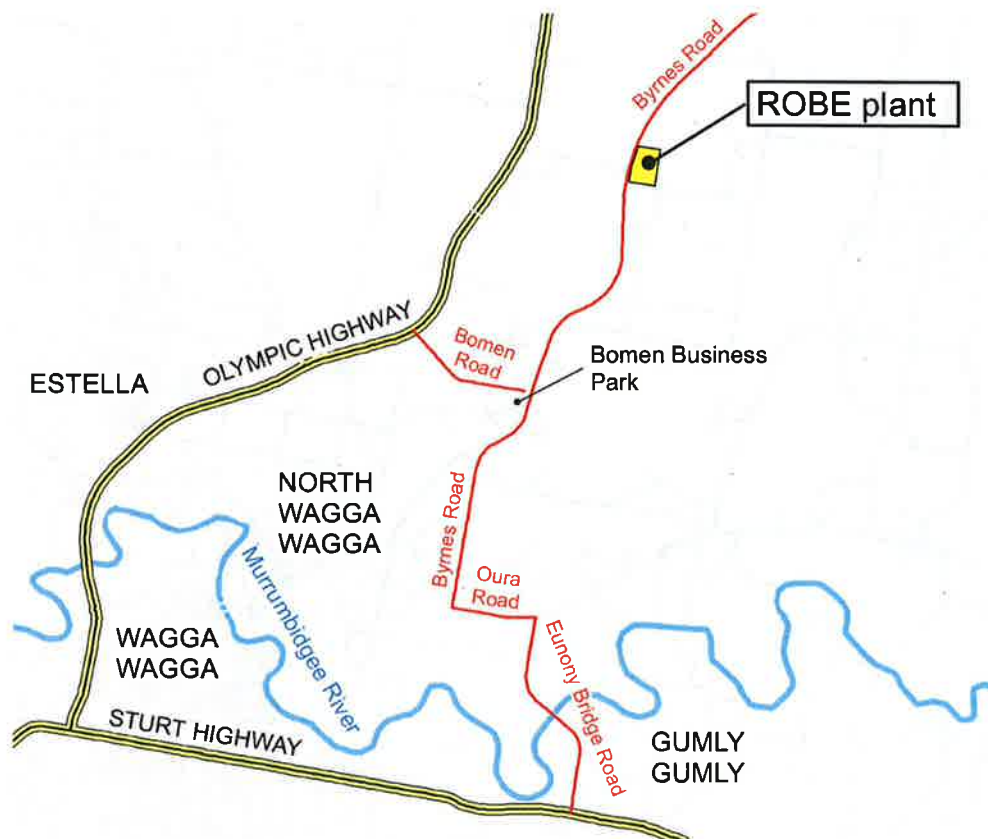


Figure 1: Site Location

3. APPROVAL HISTORY

On 4 November 2008, the then Minister for Planning granted project approval (MP 07_0146) to ROBE for the construction and operation of an integrated vegetable oil processing facility and biodiesel plant.

On 28 April 2011, the then Director-General granted approval (MP 07_0146 MOD 1) to remove the biodiesel component, alter the site layout and increase the facility output from an approved 30,000 tonnes per annum of refined vegetable oil to 66,000 tonnes per annum and reduce the output of vegetable protein meal to 90,000 tonnes per annum.

4. PROPOSED MODIFICATION

On 23 July 2015, the Proponent lodged a section 75W modification application (MP 07_0146 MOD 2) seeking approval to increase the production rate at the facility. The Proponent advises the modification is requested to enable the facility to meet market demands for vegetable/canola oil through maintenance periods and to alleviate production downtimes.

The increase in capacity would be achieved through process optimisation by the installation of new and modified production equipment. There are no new structures proposed and the augmentation of the plant would be undertaken within the existing layout of the plant.

A description of the key aspects of the modification are provided in **Table 1** below. Locations of the key site features are shown in **Figure 2**.

The Department notes the proposal would not:

- result in additional operational traffic movements;
- increase the level of solid waste generated on the site; or
- increase the likelihood of existing hazards or introduce additional hazards to the site.

Table 1: Modification Description

Proposed Aspect	Description
Modifications for the Preparation Plant (this includes the Seed Processing Plant and Solvent Extraction Plant as shown in Figure 2)	<ul style="list-style-type: none">• Installation and modifications are required for the existing Preparation Plant to account for the proposed increase in seed crushing.• Installation of the following new equipment:<ul style="list-style-type: none">• Flaker,• Flaker Feed Hopper,• Flaker Discharge Hopper,• Permanent magnet for the Cooker,• Variable frequency drive to the main motor of the Sterling Pre Press.• Modification of the following equipment:<ul style="list-style-type: none">• Increase the length of the flaker feed conveyor,• Modification of the flaker aspiration ducts,• Increase the length of the flaker discharge conveyor.
Modifications to the Refinery	<ul style="list-style-type: none">• To enable an increase in refining capacity, modifications are proposed to the following components:<ul style="list-style-type: none">• Oil feed tank sprayers• Oil feed pumps• Heat Exchange PHEs• Safety filters• Dearator transfer pump• Deodoriser oil pumps• Deodoriser oil final cooler• Final cooler tempered water pump• An additional polishing filter would be installed.



Figure 2: Location of key site features (Source: Proponent's Environmental Assessment)

The proposed modifications would enable the facility to increase the existing daily production as detailed in **Table 2**.

Table 2: Existing and Proposed Daily Production Rates

Material	Existing production rate (tonnes/day)	Proposed production rate (tonnes/day)	Percentage daily increase (%)
Canola seed crushed	500	600	20
Seed cake	363.5	436	20
Vegetable protein meal	293.5	352	20
Total extracted canola oil	206.5	248	20
Refined oil	200.5	241	20
Oil by-product	6	7	17

The modification would increase the overall annual production as outlined in **Table 3**.

Table 3: Existing and Proposed Annual Production Rates

Capacity / Production	Existing Annual Rate (tonnes per annum)	Proposed Annual Rate (tonnes per annum)	Percentage annual increase (%)
Seed Crushing Capacity	165,000	200,000	21
Refining Capacity	66,000	82,500	25
Vegetable Protein Meal Production	90,000	116,000	29

5. STATUTORY CONSIDERATION

5.1 Section 75W

The project was originally approved under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Approval for a subsequent modification was granted on 28 April 2011, also under the EP&A Act. Although Part 3A was repealed on 11 October 2011, the project remains a 'transitional Part 3A project' under Schedule 6A of the EP&A Act, and hence any modification to this approval must be made under the former Section 75W of the Act.

The Department is satisfied that the proposed changes are within the scope of section 75W of the EP&A Act and do not constitute a new application.

5.2 Approval Authority

The Minister for Planning is the approval authority for the application. However, the A/Director, Regional Assessments may determine the application under delegation as:

- the relevant local council has not made an objection; and
- a political disclosure statement has not been made; and
- there are no public submissions in the nature of objections.

6. CONSULTATION

The Department made the modification application publicly available on its website, and consulted with the Environmental Protection Authority (EPA), Riverina Water County Council, the Roads and Maritime Services (RMS) and Wagga Wagga Shire Council (Council) on the proposed modification. Notification letters were also sent to surrounding landowners.

The EPA raised no objection to the proposed modification and noted the proposal:

- is adequately covered by the existing Environmental Protection Licence (EPL);
- has the potential to exceed the licence limit for VOCs and if this occurred, additional controls must be implemented to ensure compliance with licence limits is achieved at all times;
- must meet the existing noise licence limits; and
- construction noise is to be managed in accordance with the *NSW Interim Construction Noise Guideline*.

Council raised no objection to the proposed modification and noted:

- noise monitoring should be undertaken with a noise logger rather than an attended device;
- there is insufficient information on who will undertake noise compliance monitoring and how unacceptable noise emissions would be managed; and
- additional section 94 contributions would be required.

The RMS and Riverina Water County Council raised no objection to the modification.

There were **no public submissions** received on the proposal.

7. ASSESSMENT

The key assessment issues associated with the proposed modification are considered in Table 4 below.

Table 4: Assessment of Issues

Issue	Consideration	Recommendation
Air Quality	<ul style="list-style-type: none"> An existing Environmental Protection Licence (EPL) manages air emissions from the facility, with limits placed on the discharge of Volatile Organic Compounds (VOCs), Total Suspended Particulate (TSP), Hydrogen Sulphide (H₂S) and Nitrogen Oxide (NO_x). The proposed increase in capacity and production rates has the potential to increase the in-stack pollutant concentration and flowrates and may increase peak ground level concentrations at nearby receivers. The Proponent's Environmental Assessment predicts the in-stack concentration EPL limits for NO_x, H₂S and TSP for the modified operation would be well below the EPL licence limits. Additionally, the predicted ground level concentrations for TSP and VOCs are predicted to meet NSW criteria for the nearest sensitive receptors. The Proponent's Environmental Assessment however notes there is potential for in-stack VOC concentrations to exceed the EPL limit and recommends further monitoring of VOC levels and implementation of management measures to ensure the EPL VOC limit is not exceeded. The Department is satisfied that the proposed increase in capacity and production rates would not lead to any significant air quality impacts beyond those already assessed and approved. The Department notes any potential air quality impacts associated with the proposed modification would be appropriately managed through the EPL and existing conditions of approval which set strict operational air quality limits and comprehensive monitoring and management procedures. However, to ensure in-stack concentrations comply with the EPL limits following commissioning of the modification, the Department has recommended modified conditions requiring the Proponent to undertake source emission validation monitoring and reporting following the modifications to the facility. Should non-compliances be identified additional controls would need to be implemented to ensure compliance is achieved. 	<p>The Department has recommended amended conditions to monitor and report on in-stack concentrations following commissioning of the modification.</p>
Odour	<ul style="list-style-type: none"> The Proponent's Environmental Assessment used odour measurements from April 2015 to model projected odour emissions from the facility and found the odour criterion at all nearby sensitive receivers would be met for the existing facility and the proposed modified facility. The Proponent also conducted odour modelling using previous maximum odour measurements from several stacks which showed the existing operations have the potential to exceed the odour criteria at nearby receptors. However, the Environmental Assessment considers the odour measurements from April 2015 to be representative of emissions from the plant, as there has only been one odour complaint over the preceding three-year period (2011-2014). The Environmental Assessment recommends if odour exceedances occur in the future, additional measures would need to be implemented by ROBE to manage potential odour impacts. The EPA raised no concerns regarding potential odour impacts associated with the modified facility. The Department notes any potential odour impacts associated with the proposed modification would be appropriately managed through the EPL and existing conditions of approval which require the facility to comply with Section 129 of the <i>Protection of the Environment Operations Act 1997</i>, the implementation of an Odour Management Plan and the Proponent to conduct an Odour Audit. To ensure the facility does not emit offensive odours, the Department has recommended an amended condition requiring the Proponent to undertake an odour audit should any verified complaints be made following commissioning of the modification to ensure the proposal complies with Section 129 of the <i>Protection of the Environment Operations Act 1997</i>. Subject to the recommended conditions, the Department considers that potential odour impacts would be appropriately mitigated and managed. 	<p>The Department has recommended an amended condition requiring an odour audit be prepared should any verified complaints be made.</p>

Issue	Consideration	Recommendation
Noise	<ul style="list-style-type: none"> The Proponent's Environmental Assessment indicates the proposed modifications should not result in a significant increase in noise emissions. The proposed modifications to the equipment would occur within an acoustically protected building. The noise monitoring undertaken shows the existing facility complies with existing EPL limits. The Environmental Assessment recommends compliance noise monitoring be carried out at the commencement of operations of the modified ROBE facility to confirm the noise limits are not exceeded. In the unlikely event that noise limits are shown to be exceeded, then additional mitigation measures could be incorporated into the building design to reduce noise levels to below the noise limits. The Department is satisfied the proposed modifications to the facility and increase in production would not lead to any significant operational noise impacts beyond those already assessed and approved. The Department also notes any potential noise impacts associated with the proposed modification would be appropriately managed through the EPL and existing conditions which includes a Noise Monitoring Plan developed in consultation with the EPA and approved by the Department. However, to ensure the noise emissions of the modified facility do not exceed the noise limits of the Project Approval, the Department has recommended an amended condition requiring the Proponent to undertake a noise compliance validation assessment following commissioning of the modified facility. 	The Department has recommended an amended condition requiring the Proponent to undertake a noise compliance validation assessment of the modified facility.
Traffic Management	<ul style="list-style-type: none"> The Proponent's Environmental Assessment indicates traffic generated from the proposed modification would be within the range of permitted daily traffic movements of the approved development. The Department is therefore satisfied the proposed increase in production would not result in significant traffic impacts beyond those that have been previously assessed and approved. 	No additional conditions or amendments necessary.
Hazards (SEPP 33)	<ul style="list-style-type: none"> The Department considers the Safety Management System (SMS) and Emergency Plan as required by existing Condition 44 of the approval, should both be updated to take into account the changes arising from the proposed modification. Subject to these plans being updated, the Department is satisfied that the modification would not result in any additional safety concerns. 	Conditions are recommended requiring an updated Safety Management System and Emergency Plan.
Construction Management	<ul style="list-style-type: none"> The Department is satisfied that potential construction impacts associated with the proposal would be minor and temporary in nature. The Department also notes that existing conditions of approval would appropriately manage and mitigate potential construction impacts. 	No additional conditions or amendments necessary.
Contributions	<ul style="list-style-type: none"> Council stated the proposed modification is subject to the payment of development contributions. The Department has included a condition requiring the payment of contributions for the additional costs associated with the modified proposal in accordance with the <i>City of Wagga Wagga Section 94A Levy Contributions Plan 2006</i>. 	A new condition is recommended requiring payment of additional developer contributions.

8. CONCLUSION

The Department has assessed the modification application and supporting information in accordance with the relevant requirements of the EP&A Act. The proposed modification is considered appropriate on the basis that:

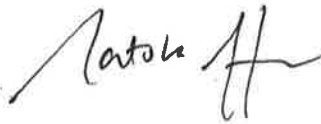
- the proposal is a relatively minor modification in the context of the existing operations;
- the proposed works are required to enable the facility to meet market demand and therefore support the facility as previously approved as part of the Major Project (MP 07_0146); and
- the proposal would not result in any adverse environmental impacts.

Consequently, it is recommended that the modification be approved subject to the recommended conditions.

9. RECOMMENDATION

It is RECOMMENDED that the Acting Director, Regional Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report;
- **approves** the application under section 75W, subject to conditions; and
- **signs** the notice of modification (**Appendix A**).



Natasha Harras
Team Leader
Regional Assessments

 11/11/15

Anthony Witherdin
Acting Director
Regional Assessments

APPENDIX A: NOTICE OF MODIFICATION

The Notice of Modification can be found on the Department's website at the following address:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7185

APPENDIX B: SUPPORTING INFORMATION

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows:

1. Modification request

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7185

2. Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7185

3. Response to Submissions

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=7185