

Director Industry Assessments

Planning Services

Dept Planning & Environment

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Mon 27th April 2015

Mr Bill SNEDDON

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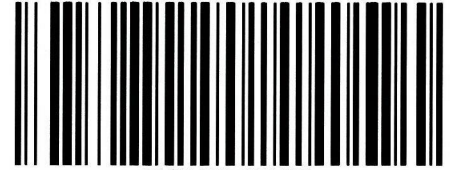
Submission to

Modification Request

ELF Mushroom Farm & Substrate Plant

Application No MP 08 02 55 MOD 1 &
CP 08 02 55 MOD 1

108 Mulgrave Road
Mulgrave.



PCU059339

Department of Planning

Received

29 APR 2015

Scanning Room

Cover page
14 Pages attached

I have viewed the Exhibited Environmental Assessment Document for Development Modification

Firstly :-

I live approximately 2Kms west of ELF Farm
Supplies in South Windsor

I have been affected by Foul Odours from this
factory, both at this residence and in the Windsor
area since 1991.

I first spoke at a HAWKESBURY COUNCIL meeting
regarding these foul ODOUR discharges in 1995, after
my children attending South Windsor Public school
complained of foul Compost odours at the school,
particularly during afternoon Easterly "Sea breezes".

My family and wider community AMENITY has
been regularly affected by Compost Odours since they
first become noticeable in 1991.

Secondly :-

- The ELF composting operation has been characterised
by
- Constant growth - many in the community have considered it to be development by stealth - regularly coming back to council for yet more capacity.
 - Continuous Emission of foul odours - despite Council and EPA orders to cease/reduce same.
 - Promises of "Magic Bullet" solutions to odour emissions at each stage of expansion over the past 20 years

- Denial of Odours emitted from the Operation

This, despite the EPA and Council on March 29th 2000 Being ON SITE at ELF, Mulgrave, detecting Compostodours and at Complaining Residents at 34 Church St South Windsor. NB - EPA staffers Tania Ritchie & Associate Council Staffers John Pye, Phillip Pletcher.

During early 2000 I developed an odour mapping method (derived from several methods I'd seen published) suited to documenting observations of odours and wind directions in the Windsor area, driving across the plume and marking time & intersection.

Over page is the ODOUR Map for 29th March 2000. (Mr Rob Tolson, owner of ELF Farm Supplies was on site at Mulgrave when EPA staffers arrived. Tania Ritchie advised Mr Tolson was UNABLE to smell the Multiple ODOUR UNITS at the Premises on Mulgrave Road, Nor at No. 4 Harris Street, Approximately 500 Mtrs downwind, across South Creek. (Page 3)

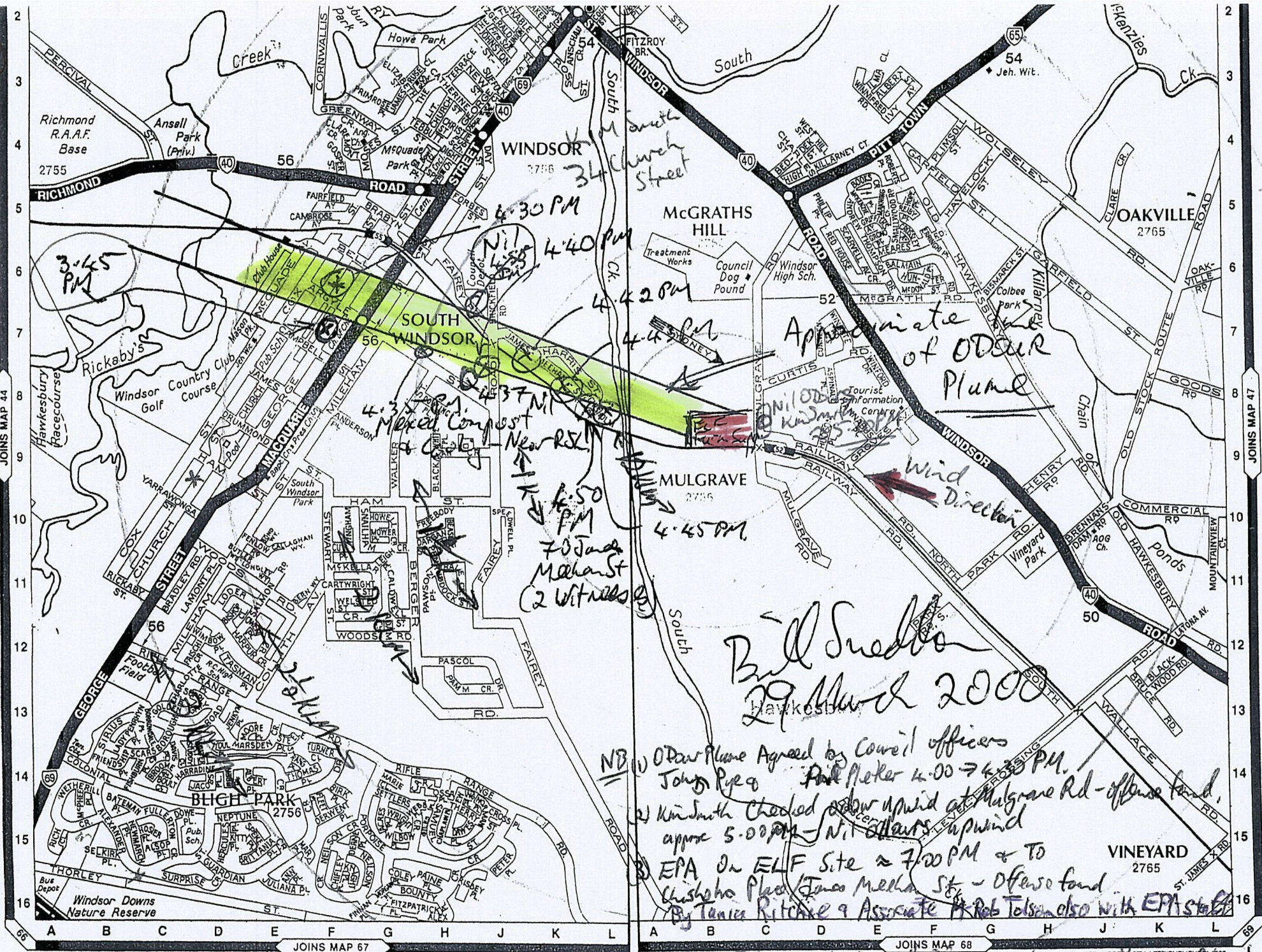
Hawkesbury Councils Staff, John Pye and Phillip Pletcher, confirmed the odour at 34 CHURCH Street, and up wind at Harris Street and ELF Farm, Mulgrave.

Following this Event, EPA & Hawkesbury Council started taking Resident Complaints more seriously and started the Process of Orders - Hawkesbury Council Subsequently started Odour Monitoring, and had Community Members start reporting.)

Also attached is a further Map, for April 2000, showing an odour Plume extending Across South Windsor, but NOT QUITE reaching my South Windsor Residence. It does affect the Net Ball Courts, where my Two Daughters Played and practiced Net Ball. (Page 4)

29th March 2000 - Mulgrave Compost Odours ex ELF Farm Supplies
 Wind a ESE, Light to Moderate, drying

(3)



Bill Smedley
 29 March 2000

- NB (1) Odour Plume Agreed by Council officers
 Tony Pye & Pat Meier 4:00 → 4:30 PM.
 (2) Kim Smith Checked odour upwind at Mulgrave Rd - offense found,
 approx 5:00 PM - No odours upwind
 (3) EPA on ELF Site ≈ 7:00 PM & to
 Chisholm Place / James Mearns St - Offense found
 By Tania Ritchie & Associate & Rob Tolson also with EPA staff

(4) Mr Rob Tolson Unable to smell Odour on site or at Harris Street

④

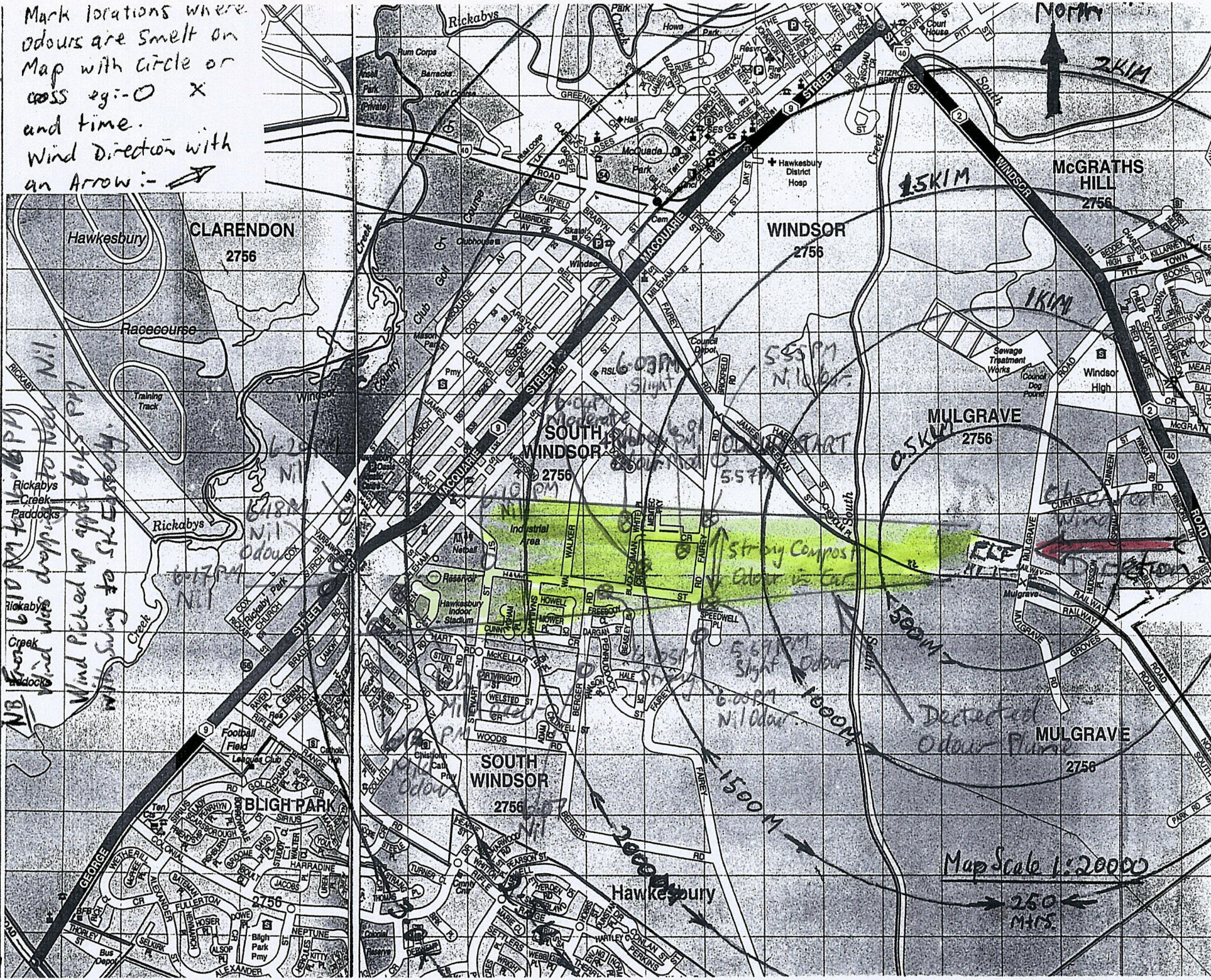
Date :- 14/3 April 2000

Date: 14th April 2000
 Times: 5.55 to 6.20 PM People Smelling: - Bill Sweddon
 Wind Condition or Direction: light, gusting to mild evening (First Snelt in car on Farey
road.
 Other Comments: Returning from PHTown signed: - By Snelt 14 April 2000

Wind Condition & Direction: light, gusting to mild evening (First Street in Car on Harvey Road).

Other Comments: Returning from Pitt Town Easterly Breeze

Mark locations where
odours are smelt on
Map with circle or
cross e.g. - O X
and time.
Wind Direction with
an Arrow :- 



During Early 2000 I odour Mapped and Submitted (5)
to Council and EPA 15 odour Maps on days when Compost
odour was detected and tracked, as well as other
Common odour Sources in the area.

The mapping of other Sources was done as Mr ROB
TOLSON constantly denied ELF was an odour Source and
I needed to document other odours in the area to confirm
Mr Tolsons statements in Council & to the Press, demonstrably incorrect.
Mr John Pye, of Hawkesbury Council, used similar
Methods in his Council investigation of odour Sources
during this Period and subsequently.

I was also on Councils odour reporting Community
panel subsequent to doing my Odour Charts/Maps.

I was to give evidence in a Council Court Case
against ELF Farm odours in the early 2000's, until a
Council Staller rolled over in the Land and Environment
Court, settling for Council without evidence presented in Court.

At about this time Council and EPA indicated
that ALL odour reports by other than Council or EPA
Staff were all treated as ANECDOTE, not regarded
as hard data report, and therefore as unreliable
evidence.

I am now on the ELF Community Liaison Committee,
mandated by the EPA to provide community Communication
and information regarding the ELF odour matters and factories,
including the requested development changes.

Thirdly :-

I have Science Training.

- NSW Chemistry Certificate - Tighes Hill Technical College 1975
- Bachelor of Applied Science - Food Technology - Hawkesbury Agricultural College 1980

During my Employment with Hunter Valley Coop Dairy 1970 → 1977 I was employed as a laboratory assistant (technician)

I held NSW Dairy Industry Authority Milk and Cream Grading Certificates - which included authority to withhold suppliers Milk for odour and flavour defects.

For some 3 years I operated and monitored a Recording Anemometers and Dust Monitoring Station in the OAK Herham Development Laboratory. This equipment was installed to provide site Base line data prior to possible construction of a nearby Coal handling site - with potential to affect Milk Powder Production and other products.

I was also a trained "nose" and "taster" in the New Product Development Laboratory, where I worked over a 4 year period.

Later, AS a FOOD TECHNOLOGIST I have worked in the Food Industry in both Quality Control and Food Product Development. In all sections of my food industry Employment I have been a trained Odour and Taste assessor and reference person with wide experience in Olfactory Assessment.

I believe I would have been fully capable of being a Calibrated "NOSE" for The ODOUR UNIT during and subsequent to my odour Mapping reporting on EHF Farm Supplies referenced above.

Submission

7

I am largely in favour of the Proposed Compost factory modifications presented

- (1) The move to more effective Biofilters (vs Scrubbers) Combined with Ammonia pre Scrubbers offers promise of more effective ODOUR control.
- (2) Full enclosure and Negative pressure Venting of the Entire Plant to the Ammonia Scrubbers and Biofilters holds potential to largely eliminate ground level fugitive emissions.
- (3) Full time Electronic Plant Control & Monitoring (SCADA) Holds potential of tighter plant control and operating conditions, favouring improved ODOUR control and reduced emissions.

My Comments follow :

- Plant Enclosure.

I feel fully vindicated in my indicated comment to the previous development, that the plant needs to be fully Enclosed. The ODOUR UNIT report identifies all the plant and conveyors & storage and Pallet must go under Negative pressure to the Biofilters.

The ODOUR UNIT also reported to the CLC meetings that ELF structures had many openings, allowing fugitive Odour emissions, this Despite EPA requiring building maintenance to repair defects AND resulting prosecution for Orders Breaches and fines resulting.

Clearly, the plant owner must be willing to (8)
Maintain and operate plant in an appropriate manner and
require operators on site to comply with operational demands.

THE DEVIL IS IN THE DETAIL.

- Sulphuric Acid

No information is supplied as to stored ACID
Strength, nor liner Tankage, transfer and holding details - apart
from Meeting Australian Standards.

I'm concerned by potential of stored Tank failure
or production problems with pumping usage.

With SOUTH CREEK close by, down slope, there
is significant potential for a spill to this waterway
from the 20,000 litres stored on site and in use.

- BIOFILTER

The BIOFILTER (with Ammonia pre scrubbers)
appear to offer potential of improved Odour Reduction.

However, Biological Systems take time to commission and
are potentially liable to varied performance as microorganism
populations may alter or be poisoned.

My concerns are -

- during commissioning &/or cleaning startup and restart,
that Odours are not adequately removed by the
developing microbes.

- Venting the Biofilters direct to Low level ambient
air will still create Low level Odour Emissions -
even if "substantially modified from their input character".

Hence, I submit that ALL EMISSIONS should

(9)

Continue to be From the Existing Plant discharge chimney stack, or stack of similar height and airflow capacity. Continuing High level discharge will provide

- Better odour dispersion compared to ground level emission
- Eliminate a new source of low level emission i.e. the Biofilters.

With all the enclosure works to eliminate fugitive emissions, why add a new low level odour source - a risky move considering the odour problems history of this operation

- A fail safe if Biofilter performance varies or is less effective than predicted.

As the chimney stack is to be retained for Biofilter startups, retention and continued use should not be problematic.

- Plant Complexity

The operation as requested has progressed far beyond its initial simple agricultural operations origin.

With the 1,200 Tonnes/week requested, size, complexity and interlinking of operations and equipment comes the need for regular maintenance and staff training to ensure operating parameters are met.

Plant complexity also carries the risk of Mechanical and Electrical failure - potentially problematic with the highly odorous materials processed on site.

- Allowed ODOUR Exposure to Near Receptors

(10)

whilst the allowed - 5 odour units to Near Rural and Industry
- 2 Odour Units to near Residential

is EPA approved, the community expects better - namely
No ODOUR beyond the Fence Line - at low level especially.

The 2 Community Liaison Committee meetings to date were
notable in that INDUSTRY OWNER panel members complained
of ODOUR impacts on their McGraths Hill & MULGRAVE
Businesses and Employees, whilst residents want all
odours to CEASE at their homes.

Clearly, AMENITY desires of Near Industry and
residents is not currently being met, nor will it be with
the EPA allowances stated above.

Industry is steadily growing in the Mulgrave/McGraths
Hill area, with a new trend being seen in approval of
a Hotel complex and more shopping complexes. These will
all move more receptors into the Near Field ODOUR area,
and potentially Increased odour problems will result. (More Complaints)

Additionally rail passengers at MULGRAVE STATION
are regularly affected by FOUL ODOURS - a common comment
of passengers on this line is their dread of the "STINK"
along the Mulgrave rail station - 5 odour units allowable.

The Jim Anderson Flood Relief Bridge has brought Road
traffic close to the ERF factory, regularly transiting through
the AMBIENT Low level fugitive Emissions from ERF Farm.

I am also affected - as a user of the Jim Anderson Bridge,
and have recently started to log complaints again.

(11)

Residents Expect BETTER, AMENITY is supposed to have serious treatment in Environmental Assessments but is clearly NOT CONSIDERED IMPORTANT in regards to this Development.

- Complaint Fatigue

My previous submission indicated complaint fatigue amongst Odour affected residents at that time.

Your analysis stated "there is no evidence that this has happened"

Department of planning offered NIL evidence to refute my reporting - comment to myself who had decided complaints to Both EPA & ELF/TOLSON hotline were routinely dismissed as baseless - if a reply was ever received.

Has dept of Planning made the effort to Review Complaints with ELF or the EPA. - EPA has some 1,200⁺ complaints over the years, including recently.

I had also stopped logging complaints in recent years on a similar basis.

A HUGE change in the OBJECTOR scenario has been the use of Mobile Phones & SOCIAL MEDIA, with the STOP THE STINK GROUP. These "Fed up" residents and commuters want ELF's foul Odours to stop affecting their lives AND consider EPA actions over recent years INADEQUATE and to not consider their amenity as they would expect. Road and Rail traffic is especially affected by Fugitive and Near-field ODOUR EMISSIONS.

(12)

The Electronic linkage of complaints by STOP THE STINK has led to vastly more active objections to affected Amenity — by both older affected residents, newly affected residents AND transient travellers want to know "What is the STINK around WINDSOR".

- EPA and ODOUR COMPLAINTS

At the last CLC meeting the EPA representative — Mr ROB HOGAN apologised to several community representatives for his comparative inaction regarding ELF Farm over the past 2 years. Citing "too much to do elsewhere", he conceded EPA should have been taking more attention to community complaints and odour reports — also failure to forcefully act on recent EPA orders relating to ELF Plant & Buildings, which have recently resulted in fines for Orders Breaches.

The Community Expects better Supervision by the EPA and enforcement of conditions to operate.

- Bioscrubber and Existing Plant.

I wish to clearly state that the New operating BioScrubber currently in use has had significant effects in Pollution Reduction.

At my Residence, Compost Odour is now only infrequently detected for Brief Periods on Easterly Sea Breezes, and not at all within the house. I have also stopped reporting, well aware that I would be told what was reported would be

Within EPA standards.

(13)

However, The BIOSAUBER has clearly been inadequate for many residents, still odour affected, and close to the plant.

- Development

I mentioned this in my last Submission. Windsor and surrounds are limited by the flood plain. However, urban densification is now required around Rail lines & Transport Hubs. Urban densification is steadily progressing in Windsor, South Windsor, with Dual Occupancies and Town Houses steadily placing more residents within the Existing ELF odour plumes.

I've also mentioned Development of McLeods Hill Industrial/Commercial Precinct - again placing more people within Reach of ELFs - ODOURS.

If ELFs Odour Controls were to suffer Catastrophic Failure, potentially the NEW VINEYARD urban growth Area could conceivably be affected by odour on Westerly Winds - A WORST CASE SCENARIO.

- Meteorology

My comments regarding Local Meteorology from the Earlier Comments regulated still stand.

As an Aircraft & Model Aircraft Pilot I note the Local meteorological peculiarities with great Interest.

I continue to observe odour effects in the area due to Thermal Effects and Local "Turbulent barbling" along ridge lines - especially near my residence.

Your reply to my local knowledge input was totally

inappropriate.

I'm Aware the Model by Homes Air etc Hqs to be more general — But does not explain local meteorology that can place odours where Not expected by the models or at greater than expected concentrations. My observations were dismissed as Anec dot — you ask for input then dismiss out of hand as incontinent.

I thank you for the opportunity to Comment on this Modification. I could write more after Being affected by odour from this development Since 1991

I would trust that resident input to this document will be given greater weight than to the previous item. I do not have the time to write a full Scientific paper on each of my submissions — as seemed to be required.

Finally,

I believe a New Condition on the development is required, as discussed by some residents:

A Sunset Clause —

If the New development cannot demonstrate Satisfactory operation within a reasonable ^{time} after completion, the WHOLE OPERATION SHOULD CEASE. — say within 2 years.

In short — put up or shut up — Make the plant work or close — AND, nil site expansion until satisfactory operation is demonstrated on Existing Plant

Bill Sneddon 28 April 2015