

DOC16/306376

Ms Fiona Gibson
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Department of Planning & Environment
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Attention: Ms Anna Scott

05 July 2016

Dear Ms Gibson

Modification Application – Woodlawn Bioreactor MP 10-0012 MOD and DA Q91/00233 MOD2

I refer to your email on behalf of the Department of Planning & Environment (DPE) and received by the Environment Protection Authority (EPA) on 22 June 2016 seeking comment on the Response to Submission (RTS) for the Veolia Environmental Services (Australia) Pty Ltd Woodlawn Bioreactor (the Premises). The abovementioned modification application seeks to change the stormwater and leachate management system at the Premises.

The EPA has reviewed the RTS and makes the following comments, noting that a meeting was held between DPE, EPA and later the Proponent on 01 July 2016 regarding this and other matters:

Air Quality and Odour Impacts

The EPA is satisfied that the RTS addresses its earlier concerns about potential air quality and odour impacts. Specifically, the EPA notes that:

- The odour dispersion assessment and modelling has been carried out in accordance with relevant guidance material and demonstrates that odour from the proposed modification will not impact offsite receivers under worst case conditions;
- The assessment includes a calculation of overall net odour emissions from the proposed modification and indicates that there will be a net decrease in odour emissions. This calculation recognises that a predicted increase in odour emissions from leachate storage will be offset by a reduction in odour emissions from the landfill void;
- The Proponent intends to undertake a staged process of constructing storage dams within ED3S. The construction of the ED3SS dam will only reflect a 4% odour emission increase (compared to a 17% increase for ED3S in its entirety) and that the Proponent expects to have a new leachate treatment solution delivered prior to constructing any additional dams.
- The Proponent has developed treatment criteria that will be observed to ensure that treated leachate transferred to ED3S does not become more odorous than has been predicted.

Long-term Leachate Management Solution

The EPA remains concerned that the proposal to discharge treated leachate to ED3S is only an interim leachate management solution while the Proponent develops and implements an adequate long-term leachate management solution for the Premises.

As discussed on 01 July 2016, the Proponent has not yet provided any specific details about the long-term leachate management solution with there being a risk that the storage capacity of ED3S will be exhausted before the long-term solution is operational.

As noted in the EPA's initial submission on the modification application, ED3S will provide between 0.7 years and 5.8 years of treated leachate storage before it is full, depending on future climatic sequences and rates of leachate transfer. If full, the rate of leachate extraction from the void would need to be significantly reduced to between 0.15 and 1.2 litres per second. If prolonged wet climatic sequences occur during this time, leachate extraction from the void would need to be reduced further or even suspended. Such a situation would be unacceptable to the EPA. Not only would the Proponent be back to its current position in terms of its inability to properly control leachate levels within the waste mass, but it would have an additional odour source (ED3S) to manage as well.

The EPA does note however that the Proponent has verbally committed, on 01 July 2016, to providing a long-term leachate management solution concept proposal by 01 August 2016.

As such and noting the operational importance of this modification application, the EPA supports its approval subject to the inclusion of a condition of approval requiring that the Proponent submit the abovementioned concept proposal by no later than 12 August 2016 and that it includes a timeline for the detailed design, installation and commissioning (taking into account the limited lifespan of ED3S). The EPA would then seek to include the concept proposal as a Pollution Reduction Program on the environment protection licence for the Premises.

If you have any questions about this matter, please contact Nick Feneley on (02) 4224 4144.

Yours sincerely



MATTHEW CORRADIN
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Environment Protection Authority