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STANDARD POST AND EMAIL
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Dear Ms Gibson

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

Thank you for your invitation to provide comments on Veolia Environmental Services (Australia) Pty Ltd's application to modify the project approval for the Woodlawn Bioreactor at Collector Road, Tarago. The application seeks to modify the stormwater and leachate management system at the site.

The EPA has reviewed the application and wishes to make the following comments:

Air Quality Impacts

The EPA has received, and continues to receive, numerous complainants about offensive odour emanating from the premises. Action to reduce odour from the site is needed and it is the EPA's expectation that any modification to the operation will not increase overall odour emissions.

If the proposed modification is approved, the dam area for treated leachate storage will increase from 42,000 m² to 160,000 m², an increase of 380%. The Odour Assessment (OA) submitted with the application estimates that this will increase odour emissions from this source by 18,700 ou.m³/s and will increase overall odour emissions from the premises by up to 17%.

The OA states that this increase is insignificant and will not cause offsite impacts given the distance of the odour source from potential receptors (the closest receptor being 1.6km from the Woodlawn site) and the character of the pond emissions being relatively neutral (described as earthy/mildly ammoniacal). The EPA does not support this assertion and recommends that the Department seek further justification of this from the proponent. This is important given the numerous complaints about offensive odour the EPA has received from residents living much further away from the facility than 1.6km and the fact that the statements made in the OA were made in the absence of any odour dispersion modelling.

It is also recommended that the Department seek the following additional information from the proponent:

- An explanation of how, and the scale at which, leachate build-up impacts on odour emissions from the landfill void.

- The predicted reduction in odour emissions from the void that will be achieved if leachate levels in waste are better controlled.
- The quality criteria that will be observed to ensure that treated leachate transferred to ED3S does not become more odorous than predicted.
- The monitoring program that will be implemented to monitor the quality of treated leachate in ED3S and its potential to generate offensive odours.
- The contingency measures that will be implemented to manage odour emissions from ED3S should emissions be higher than predicted.

Impact of long-term operation of the facility

The proposal appears to be only a short term solution to controlling leachate levels in the waste mass and it is unclear how the proposed modification fits in with the facility's longer-term leachate management strategy.

Time estimates for the ED3S pond to fill up depend on future climatic sequences and rates of leachate transfer. The application states that leachate transferred from the landfill void is expected to vary between 0.5 and 3.0 L/s. Simulated estimates for the historic wettest, the driest and the average climate sequences show that the ED3S pond will provide between 0.7 years and 5.8 years of treated leachate storage before it is full. At that point, the rate of leachate extraction from the void would need to be significantly reduced to between 0.15 and 1.2 L/s. If prolonged wet weather conditions occur, 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.

The EPA is concerned that if the leachate treatment system is not upgraded sufficiently to facilitate an alternative method of disposal before the ED3S pond system reaches capacity, the proponent's ability to manage leachate and control odour emissions from the site will be worse than it is now.

It is recommended that the Department seek additional information from the proponent about the following:

- Progress to date on improvements to the leachate treatment system and the actions that it is taking to further improve the system and reduce the need for the storage of treated leachate.
- The expected timeframe required to upgrade the leachate treatment system to a level that will allow for an alternative method of disposal.
- The contingency measures that would be implemented should the upgrades not be completed before ED3S reaches capacity.

If you have any questions or would like to discuss this matter further, please contact Nick Feneley on (02) 4224 4144.

Yours sincerely



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