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26 October 2021

**EPA Advice on Environmental Impact Statement for proposed Snack Brands Manufacturing Facility, Orchard Hills (SSD-18204994)**

Dear Shaun

Thank you for the request for advice from Public Authority Consultation (PAE-28034040), requesting the review by the NSW Environment Protection Authority (EPA) of the Environmental Impact Statement (EIS) for the proposed Snack Brands Australia Industrial Food Manufacturing Facility (SSD-18204994) at 2 and 14 Distribution Drive, Orchard Hills.

As advised in the response provided on 13 October 2021, the EPA has provided comments on noise and vibration, and water. There is no change to the previously provided comments on noise and vibration, and water.

As advised in the response provided on 13 October 2021, review of the *Air Quality Impact Assessment – Northstar Air Quality Pty Ltd – 23 August 2021* was still being undertaken. This review has now been completed.

The EPA comments on air and odour are outlined in Section 1.b. of this letter and detailed comments are contained in Attachment B.

As requested by the Department of Planning, Industry and Environment (DPIE), this letter forms EPA's consolidated response to the request for review of the EIS for the proposed Snack Brands Australia Industrial Food Manufacturing Facility (SSD-18204994).

The EPA has reviewed the following documents:

- *Environmental Impact Statement SSD-1820499 Version No. 2* – Willowtree Planning Pty Ltd – 24 August 2021 (EIS)
- *Stormwater Report Revision 01* – Henry & Hymas Consulting Engineers Pty Ltd – July 2021
- *Noise Emission Assessment of Warehouse Expansion version TL950-01D02 SSDA Acoustic Assessment (r1)* – Renzo Tonin and Associates – 10 August 2021
- *Waste Management Plan v2.1* – SLR Consulting Australia Pty Ltd – 23 August 2021
- *Air Quality Impact Assessment (21.1083.FR2V2)* – Northstar Air Quality Pty Ltd – 23 August 2021.

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The EPA understands the proposal is for the:

- construction of a manufacturing facility, including conversion of part of the existing distribution warehouse facility to manufacturing, that will operate 24 hours a day to produce potato and corn chip products
- construction of a wastewater treatment plant
- storage of bulk oil and dangerous goods.

Based on the information provided, the proposal will require an environment protection licence (licence) under Clause 2 of Schedule 1 of the *Protection of the Environment Operations Act 1997* (the POEO Act) for agricultural processing. Under Sch 1, Clause 2 of the POEO Act, an activity requires a licence if there is a capacity to produce more than 30,000 tonnes of agricultural produce per year.

It is the responsibility of the proponent to apply for a licence from the EPA if planning consent is granted for the proposal.

The EPA has reviewed the EIS and notes that the EIS does not provide sufficient information to determine if recommended conditions of approval can be provided. The EPA therefore requests that the following information be provided.

## **1. Matters to be addressed prior to determination**

### **a. Noise and vibration**

The EPA has reviewed the EIS and the *Noise Emission Assessment of Warehouse Expansion version TL950-01D02 SSDA Acoustic Assessment (r1)* – Renzo Tonin and Associates – 10 August 2021 (NIA). As a consequence, the EPA would like DPIE to confirm what noise limits should be used for this project, in particular whether noise limits outlined under C16 of SSD-7173 for the First Estate Precinct are to be used as project specific noise limits, or whether these noise limits should be considered as the total and cumulative limit of all developments within the precinct. This information is necessary for the EPA's assessment of this proposal and its future regulation of this premises.

Should noise limits under C16 of SSD-7173 be adopted for each separate development in the precinct, there may be a risk that cumulative impacts will adversely impact the noise amenity of the surrounding community. The EPA does not currently have sufficient information to determine if this will occur, however it is important that DPIE be aware of the risk that cumulative noise impacts from all these developments could exceed the amenity criteria under the Noise Policy for Industry (NPfI).

The EPA's review of the NIA has identified a number of other issues that will need to be addressed. In particular the NIA should be updated to:

- address DPIE's advice on how the noise limits under SSD-7173 and SSD-9429 interact and apply for the current application
- adequately identify and assess impacts on residential receivers on Mandalong Close and on the Old MacDonald Childcare Centre
- adequately assess the impact of the proposed development against the sleep disturbance criteria
- demonstrate how matters have been considered and assessed in accordance with the Noise Policy for Industry, in particular Fact Sheet C: corrections for annoying noise characteristics
- provide further details on the basis of the noise modelling assumptions
- ensure the noise modelling adequately reflects the proposed development.

Further details are provided in *Attachment A. Comments on Noise Emission Assessment of Warehouse Expansion, dated 10 August 2021, Renzo Tonin and Associates, version TL950-01D02 SSDA Acoustic Assessment (r1) (NIA)*.

## **b. Air and odour**

The EPA has reviewed the EIS and the *Snack Brands Australia, Air Quality & Odour Impact Assessment, prepared by North Star Pty Ltd., dated 23 August 2021, (21.1083.FR2V2)* (The AQIA).

Although the AQIA has been undertaken in general accordance with the EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, additional information is required to verify conclusions and results presented.

The EPA's review of the AQIA has identified a number of issues that will need to be addressed:

- there is uncertainty regarding the input data and assumptions made in the preparation of the AQIA assessment
- the proponent must demonstrate that there are procedures in place to ensure that the equipment plant expected performance can be achieved on an ongoing basis
- the efficiency of some of the proposed odour mitigation controls is unclear
- the approach to assess odour impacts must be revised
- the risk of odour impacts from the proposal must also be put in the context of the history of complaints at the two existing facilities and additional mitigation measures that can be implemented if there are odour problems once operational.

Further details are provided in *Attachment B. Comments on Snack Brands Australia, Air Quality & Odour Impact Assessment, prepared by North Star Pty Ltd., dated 23 August 2021, (21.1083.FR2V2)*

## **2. Matters to be addressed with conditions**

### **a. Water**

The EPA has reviewed the EIS and notes that potentially contaminated water will be processed through the onsite Wastewater Treatment Plant before discharge to the sewer system via a Trade Waste agreement.

The EIS identifies that no discharge point will be required, and that the facility is to be designed so that site stormwater will be managed at an off-site, downstream detention basin.

The EPA would like to remind Snack Brands Australia that the facility should be designed so that any contaminants are contained by bunding.

The EPA will be putting the following conditions on the licence to ensure this happens:

- Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997
- The licensee must store all chemicals, fuels and oils used on site in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards.

If you have any questions about this request, please contact Joanne Bell on 9274 6285 or via email at [joanne.bell1@epa.nsw.gov.au](mailto:joanne.bell1@epa.nsw.gov.au).

Yours sincerely



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**Attachment A. Comments on Noise Emission Assessment of Warehouse Expansion, dated 10 August 2021, Renzo Tonin and Associates, version TL950-01D02 SSDA Acoustic Assessment (r1) (NIA)**

**Clarification on relevance of noise conditions under SSD-7173 and SSD-9429**

Development of the First Estate Precinct was granted under SSD-7173. Both the existing Snack Brands warehouse approved under SSD-9429, and this current application for a manufacturing facility are within the First State Precinct.

The project approval for SSD-7173 includes noise limits which apply to all relevant land uses within the Precinct (referred to as Development in SSD-7173 conditions). Specifically, condition C16 states:

**C16.** The Applicant shall ensure that noise generated by operation of the Development does not exceed the noise limits in Table 2.

**Table 2: Noise Limits dB(A)**

Location	Day LAeq(15 minute)	Evening LAeq(15 minute)	Night LAeq(15 minute)	Night LA1(1 minute)
Receiver A	41	41	37	48
Receiver B	37	37	35	49
Receiver C	36	36	35	49

**Note:** Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. Refer to the plan in Appendix 4 of this consent for the location of residential receivers.

Condition C19 states:

*Within three months of the commencement of operations on-site and at any time any additional warehouse becomes operational, the Applicant shall undertake noise testing and submit a Noise Validation Report (NVR) to the satisfaction of the Secretary. The NVR shall:*

*(e) identify mitigation and/or management measures required to ensure compliance with the operational noise limits in Condition C16 and the sleep disturbance criteria outlined in the Industrial Noise Policy.*

As SSD-7173 applies for the entire First Estate Precinct, the EPA believed that the noise limits in C16 would apply as total, cumulative noise limits from the precinct, rather than as separate noise limits for each development within the precinct. From EPA's review of the current application and from its discussions with DPIE, we understand this may not be the case. In particular, we understand that the noise impact assessment for Snack Brand's Warehouse (SSD-9429) used the noise limits under Condition C16 as the assessment criteria. However, it is not clear if the assessment considered the cumulative noise level from all land approved under SSD-7173, or if it simply assessed the individual lot against the noise limits from SSD-7173.

The EPA understands that under the current application (namely SSD -18204994) it is proposed that the existing warehouse noise limits approved under SSD-9429 be adopted and that these limits apply to the whole site.

Before providing comment on this project, the EPA requests that DPIE clarify whether condition C16 of SSD-7173 applies as a cumulative limit for all developments in the First Estate Precinct, or if it is to be used as a noise project limit for each individual site. This information is necessary for the EPA in its future regulation of this premises.

Should noise limits under C16 of SSD-7173 be adopted for each separate development in the precinct, there may be a risk that cumulative impacts will adversely impact the noise amenity of the surrounding community. The EPA does not currently have sufficient information to determine if this will occur, however it is important that DPIE be aware of this risk, namely that cumulative noise impacts from these projects may exceed the amenity criteria under the NPfl.

**EPA recommends** that DPIE clarify in writing the relevance of the noise criteria under SSD-7173 and SSD- 9429 in relation to the proposed development. The NIA should be updated, in line with this advice.

### **Inadequate identification and assessment of impacts for receivers on Mandalong Close**

The proposal has not adequately identified impacted receivers on Mandalong Close or assessed the impact on the receivers, including the worst-case scenarios, in accordance with the NPfI or SSD-7173 and SSD-949, if applicable.

The NIA needs to be revised to ensure impacts on all residential receivers are identified, including worst case scenarios (which currently appears to have been overlooked).

The NIA has selected two receivers (22-31 Mandalong Close and 73 Mandalong Close) as representative of all residential receivers on Mandalong Close. However, the noise contour plots in NIA Appendix F, appear to show that noise levels may be higher at other residential receivers on Mandalong Close than those two receivers assessed in the NIA.

Furthermore, the assessment location as defined by Section 2.6 of the NPfI states that noise should be assessed at the reasonably worst affected location on or within the property boundary, or if the boundary is more than 30m from the dwelling, the assessment location should be located 30m from the dwelling. It's not clear from Appendix F that the assessment location has considered these requirements.

From the noise contour plots in NIA Appendix F, it appears that some receivers on Mandalong Close may experience noise levels higher than those assessed in the NIA. The existing approval for SSD-9429 only nominates one receiver (the receiver at 65-73 Mandalong Close) where noise limits apply.

The NIA has sought to assess the impact from the proposed development using the noise limits from SSD-9429. However, since noise levels at receivers adjacent to 65-73 Mandalong Close may be higher, it's not clear if the proposed development is predicted to cause an impact at these receivers.

According to Table 4.5, the predicted noise level at 23-31 Mandalong Close under noise-enhancing conditions is 35 dBA, and at 73 Mandalong Close 34 dBA. Using the indicative noise level from the contour maps in NIA Appendix F, noise levels at other receivers on Mandalong Close could be up to 5 dB higher than those predicted at 23-31 and 73 Mandalong Close in NIA Table 4.5.

However, EPA understands that noise limits in the SSD-7173 and SSD-9429 Conditions of Approval only name 65-73 Mandalong Close as a receiver. It's not clear why the NIA has applied the existing approval limits at some receivers on Mandalong Close (23-31 and 73) and not others.

In lieu of any existing noise limits in previous SSD Conditions Approvals, the EPA advises that these receivers could be assessed using a Project Noise Trigger Level (PNTL) determined under the Noise Policy for Industry (NPfI).

NIA Section 3.3 has referenced previous noise monitoring undertaken at a receiver in Mandalong Close for SSD-7173, which could be referenced to developed Project Noise Trigger Levels for receivers in and around Mandalong Close, as it would not include noise from the existing Snack Brands warehouse.

**EPA recommends** that:

- the NIA be updated to adequately identify and assess impacts on residential receivers on Mandalong Close.
- the point-to-point calculation for all residential receivers on Mandalong Close are presented and assessed in the NIA so that the impacts at all receivers in this area can be reviewed. The

assessment location at the residential receivers should consider the requirements of NPfI Section 2.6.

- Any potentially affected receivers not identified under SSD-7173 or SSD-9429 should be assessed in accordance with the NPfI, taking into account requirements under SSD-7173 and/or SSD-9429, as advised by DPIE.

### **Inadequate assessment of impacts on Old MacDonald Childcare Centre**

The impact at Old MacDonald Childcare Centre has not been adequately assessed and needs to be updated.

The NIA states in Chapter 3.1 that the childcare centre has been assessed using the project noise trigger level (PNTL) from the NPfI for passive recreation areas. However, the NIA uses a value of  $L_{eq,15min}$  53 dBA as a basis for the assessment in NIA Table 4.5. This is not consistent with the passive recreation amenity level in Table 2.2 of the NPfI.

The amenity level for passive recreation areas in Table 2.2 of the NPfI is  $L_{eq,period}$  50 dBA, which when converted to a 15 minute project amenity level using the standard procedures in the NPfI becomes  $L_{Aeq,15min}$  48 dBA.

Furthermore, EPA consider it appropriate that the internal areas of the childcare centre are assessed according to the amenity level for school classrooms in NPfI Table 2.2. The building envelope performance of the centre can be taken into account when converting the internal level to an external level for the purposes of the assessment.

**EPA recommends** that the PNTL for the external areas of the childcare centre be revised in the NIA to reflect the appropriate amenity level for passive recreation areas. The internal areas of the centre should also be assessed using a PNTL based on school classrooms from Table 2.2 of the NPfI.

### **Sleep Disturbance Assessment**

The NIA has not adequately assessed sleep disturbance criteria or identified how sleep disturbance has been calculated.

Table 4.7 details predictions for the sleep disturbance assessment. The table appears to use the  $L_{eq,15min}$  descriptor, when the criteria used in the NIA uses an  $L_{max}$  or  $L_{A1,1min}$  descriptor.

The location of sources of maximum noise level also need to be considered, for example air brakes may be used in the north of the site at the truck exit, the weigh bridge, or the corn loading area. The NIA does not state where the maximum noise level source was assumed to be, and this information should be included.

**EPA recommends** that the descriptor and calculations for the sleep disturbance criteria be clarified. The location of the sources associated with maximum noise level events should be provided.

### **Modifying Factors**

The NIA has not adequately assessed matters in accordance with Fact Sheet C: Corrections for annoying noise characteristics under the NPfI.

NIA Chapter 4.3.3.1 appears to indicate that a 5 dB penalty has been added to the truck reversing beacon due to its tonality. However, Fact Sheet C penalties are assessed and applied to the total noise emission at receivers, not individual sources.

The NIA also does not appear to have assessed the potential for low frequency noise. The NIA appears to have only considered trucks reversing in assessing for intermittent noise.

However, EPA is concerned that equipment with the potential to cycle on and off has not been adequately described in the assessment for intermittency. NIA Chapter 4.4 lists a number of items of plant which have the potential to cycle on and off during the night period such as refrigeration plant, cooling equipment or fans/ventilation equipment.

**EPA recommends** that the NIA provides details of the assessments required under Fact Sheet C, including low frequency noise and clarifying mechanical plant, ventilation or other industrial processes that cycle on and off during the night, and assess modifying factors using the total noise emission at receivers.

### **Additional information to be provided on noise modelling assumptions**

The NIA needs to be updated as insufficient and inconsistent information has been provided to effectively model noise impacts.

NIA Chapter 4.4 includes recommendations for the mitigation of rooftop mechanical plant including refrigeration, cooling towers and rooftop fans and lists sound power level limits for each item, however there is no description of the type, number of or location of these items of plant in the NIA.

Therefore, it's unclear how noise level limits can be placed on items of plant without further information regarding the type, the number of that type, location and other factors which may affect their noise emission.

The architectural plans provided with the Environmental Impact Statement show a number of smoke fans, exhaust fans, cooling equipment and many other types of mechanical plant located on the proposed warehouse roof. However, it does not appear from the maps in Appendix F that any of this plant has been modelled on the rooftop and there is limited information in the rest of the report regarding this.

The noise breakout from activities occurring within the buildings has not been transparently defined in the NIA, nor has the number and location of openings been described and what factors affect them in order to achieve the stated noise emissions.

NIA Chapter 4.4 states that "doors on the northern façade of the warehouse must be kept closed except as required for ingress/egress." It's not clear what is meant by this statement, for example how often would these doors be used for ingress/egress, how long would they be open for, would they be required to be open for typical operation and how might it affect the total noise emissions if they are open.

The use of a maximum noise level of 115 dBA for truck airbrakes may have implications for the Leq assessment as well. There has been up to 3 trucks modelled on site during a 15-minute period. If the truck air brakes last for a few seconds, this has the potential to impact the Leq assessment.

Figure 10 of the Environmental Impact Statement (EIS) shows the proposed layout of the development. There appears to be discrepancies with what is shown as modelled in Appendix F and where noise sources may be expected to be located.

An indicative review of EIS Figure 10 indicates:

- A large car park is located to the north of the warehouse buildings, which does not appear to have been assigned noise sources in the NIA. There are around 250 spaces in the car park which has the potential to be a significant noise source during shift changeover or other significant movements events

- The truck exit from the premises is at the north of the premises, into the turning circle area of Distribution Drive. This does not appear to be reflected in the modelled truck pathways in the NIA
- It's not clear where external forklift movements will occur in either the NIA or the plans.

**EPA recommends the following:**

- A labelled map showing the location of all modelled noise sources should be included in the NIA for both Leq and Lmax sources
- The location, type, amount, and other relevant information regarding mechanical plant should be provided in the NIA. The sound power levels for each type of plant should be included in the source emissions inventory. Where detailed information is not known, a conceptual sound power level could be used
- Further information should be provided listing the sources and their location affecting noise breakout from the building (such as doors/openings), and the operational requirements for all openings/doors
- Truck air brakes and other potential maximum noise sources should be adequately accounted for in the Leq assessment as well as the maximum noise level assessment
- All external noise sources should be clearly presented and be consistent with the proposed plans, site layout and operations for the development, including truck movements, car park vehicle movements and forklift movements. The NIA should be revised to include this information.

**Clarification for the address at Location B**

EPA notes that Location B in both the NIA and SSD-7173 and SSD-9429 is nominated as having the address 579 Mamre Road, Orchard Hills. However, the property where Location B has been assessed in NIA Figure 2 is given the address 579A, Mamre Road, Orchard Hills in SIXMaps.

**EPA recommends** that the proponent clarifies the address for Location B.

**Noise management measures**

EPA notes that the noise management measures in NIA Chapter 4.4 are critical to the premises being able to achieve its stated noise emissions and suggest these and any revision to them are carefully considered in any conditions of approval.



**Attachment B. Comments on Snack Brands Australia, Air Quality & Odour Impact Assessment, prepared by North Star Pty Ltd., dated 23 August 2021. (The AQIA)**

**There is uncertainty regarding the odour emission rates used in the preparation of the modelling scenario**

The AQIA indicates that where specific monitoring data was not available for new plant equipment, “proxy” values based on existing plant equipment were used. Table 9 in the AQIA presents the assumed equivalence made between existing and new plant equipment.

Table D1 in the AQIA includes a summary of the emission estimation methodology used for the assessment of potential impacts due to the proposal. This table includes, amongst other things:

- Historical results from odour monitoring undertaken at the Blacktown facility
- Specification parameters for the UPC-2 fryer
- A summary of the odour emission rates (OER) used in the modelling scenario.

It is stated that where the measured OERs were larger than the specification parameters, the specific parameter data was used in the model. Noting that the measured concentrations are significantly higher (up to one of order of magnitude) than the specification parameter data, it is considered that the proponent must provide additional information to allow for a robust and transparent review of the assumptions made in the AQIA.

Further, it is unclear if the adopted odour emission rates are representative of worst-case odour emissions including but not limited to expected peaks in odour emissions.

**The EPA recommends** the AQIA be revised to include:

- detailed discussion to robustly and transparently demonstrate that the use of the “specification parameter data”, instead of the significantly higher measured data, for the UPC-2 is appropriate to characterise odour emissions, including those from existing equipment to be relocated to the proposed facility
- detailed discussion to explain why the UPC-2 “specification parameter data” was chosen over the PC-42 fryer data
- the manufacturers specification parameter data or performance guarantee for the UPC-2 and PC-42 fryers
- detailed analysis to demonstrate that the adopted emission rates are representative of the proposed scale of operations and operating ranges (i.e. operating rates)
- a modelling scenario representative of worst-case odour emissions.

**Monitoring results presented in the AQIA indicate that additional measures may be required to ensure that the equipment plant expected performance is achieved on an ongoing basis**

The AQIA indicates that the proposed facility is intended to consolidate the operations of the two existing facilities (i.e. Blacktown and Smithfield) into one facility. It is understood that some of the equipment plant from the two existing plants will be relocated to the new proposed site. This includes but is not limited to the UPC-2 fryer.

As previously noted, historical odour emission monitoring shows that the measured concentrations for the UPC-2 and UPC-42 fryers are significantly higher than corresponding specification parameters. This indicates that the expected equipment performance is not being achieved.

Further, and noting that there is limited information regarding the significant difference between the measured emissions and the anticipated equipment performance, this may indicate that the plant is not being maintained and operated in a proper and efficient manner, as required by sections 124 and 125 of the *Protection of the Environment Operations Act* (POEO Act).

**The EPA recommends** the proponent provides a summary of clear metrics (e.g. triggering levels, indicators), routine monitoring and/or surrogate monitoring that the proponent will use to inform the

operations and demonstrate that the plant equipment is being maintained and operated in a proper and efficient manner, including achieving the expected equipment plant performance on an ongoing basis.

**The efficiency of some of the proposed odour mitigation controls is unclear**

The AQIA indicates that there will be 17 commercial kitchen emission sources. It is understood that the emissions from 11 of these sources (identified as 1 – 11 as per Table D-1) will be controlled by a series of after burning waste heat boilers and subsequent heat exchangers.

However, the efficiency of these controls is not specified. It is also unclear if the monitoring results presented in the AQIA are representative of the implementation of these odour controls.

Further, it is unclear if the proponent has considered and evaluated engineering controls to reduce emissions from any of the other identified sources.

**The EPA recommends** the proponent:

- Confirms whether the odour emission testing results are representative of the implementation of the proposed control equipment
- Provides additional information regarding the expected efficiency of the nominated odour control equipment
- Confirms whether engineering controls for all the identified odour sources have been evaluated and considered.

**The approach to assess odour impacts at the identified receptors must be revised**

The AQIA includes two different odour criteria to assess potential impacts due to the proposal. Namely, a 2OU at residential areas and 7OU criterion at industrial receptors. A single odour assessment criterion is to be applied to all sensitive receptors surrounding the proposed activity regardless of the variation in population density (including at different directions) surrounding a proposed activity. Further, it is noted that Figure 3 shows that the land to the north and west from the proposed facility is classified as R2, which permits, amongst others, the development of recreation areas, dwellings, and schools. As such, since the proposal site is in Orchard Hills, an 'urban centre' (as defined by the Australian Bureau of Statistics), the EPA considers an odour assessment criterion of 2 OU is appropriate.

It is noted that the assessment presents ground level odour concentrations at a number of specific residential and industrial receptors. However, it is noted that the Fire and Rescue NSW Emergency training academy located south from the proposed south has not been identified as a sensitive receptor.

**The EPA recommends** the AQIA be revised to:

- Adopt an odour criterion of 2 OU
- Present segregated odour results for the Fire and Rescue NSW Emergency training.

**The assessment of the odour risk due to the proposal must also be informed by the history of complaints from the two-existing facilities and the identification of additional mitigation measures**

There is considerable uncertainty inherent in using dispersion modelling to assess odour impacts from the premises. Compliance with odour assessment criterion is therefore, just one tool that provides an indication of expected level of odour impacts.

It is important for the proponent to understand the odour risk of their project as it is the proponent's responsibility to comply with Section 129 of the POEO Act. Should odour impacts be experienced once a facility is operational the proponent will need to address these odour impacts and, if necessary, modify the facility based on actual operational outcomes.

An assessment of odour risk involves putting the impact assessment result into context through the consideration of additional information. This additional information may include but is not necessarily limited to:

- A detailed analysis of the history and nature of odour complaints at the two existing facilities received by the Licensee and the corresponding Appropriate Regulatory Authority.
- Discussion regarding the expected odour character and its potential offensiveness
- Worst case emissions dispersion modelling scenario
- The identification of additional mitigation measures that can be implemented if odour problems occur once operational.
- Dispersion modelling demonstrating the reduction in odour impacts with the implementation of the additional feasible mitigation measures.

**The EPA recommends** the proponent must evaluate the odour risk level of their project. The evaluation of odour risk must, as a minimum, consider the examples listed above. This information is important as it will demonstrate to the EPA the proponents' level of understanding regarding the odour risk of their facility and their obligation to comply with Section 129 of the POEO Act.