



Patrick Autocare

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Wednesday, 10 June 2015

Attention: Jane Flanagan

RE: KEMBLA GRANGE RESOURCE RECOVERY FACILITY

Dear Jane,

This submission has been prepared by Patrick Autocare (PAC) to address the Response to Submissions Report (Report) prepared by TCG Planning (TCG) on Behalf of Bicorp Pty Ltd and updated Air Quality Assessment by GHD (April 2015). PAC operates the site at 17 Reddalls Road and 66 West Dapto Road as a vehicle storage facility. We remain concerned that the proposal at the Kemplra Grange Resource Recovery Facility (KGRRF) will have unacceptable environmental impacts on staff and operations.

Location of Sensitive Receiver – Dust Deposition

The Report notes that the revised Air Quality Assessment includes the PAC site at 66 West Dapto Road as a sensitive receptor. We welcome this revision to the assessment.

On page 27 of the Response to Submissions Report, TCG quotes the Air Quality Assessment at Section 6.2, which states: *"to be conservative, the receptor location for dust deposition has been assumed to be at the northern boundary of the Patrick Autocare property. This has been undertaken to show that dust deposition levels are predicted to be below the criteria on the entire site"* (emphasis added).

Similarly GHD notes on page 40 of the Air Quality Assessment *"*Note for Patrick Autocare PM10, PM2.5 and TSP have been predicted at the nearest building. Deposited dust has been predicted at the boundary of the site."*

However Figure 17 of the GHD assessment *"Predicted Annual dust deposition (with mitigation) g/m2/month"* (included below) shows the location of the PAC Sensitive Receiver "R6" on the northern end of the site's building. The location of the dust receiver identified in the text as being on the northern property boundary is not shown. To provide clarity the location of both receivers should be shown on Figure 17.



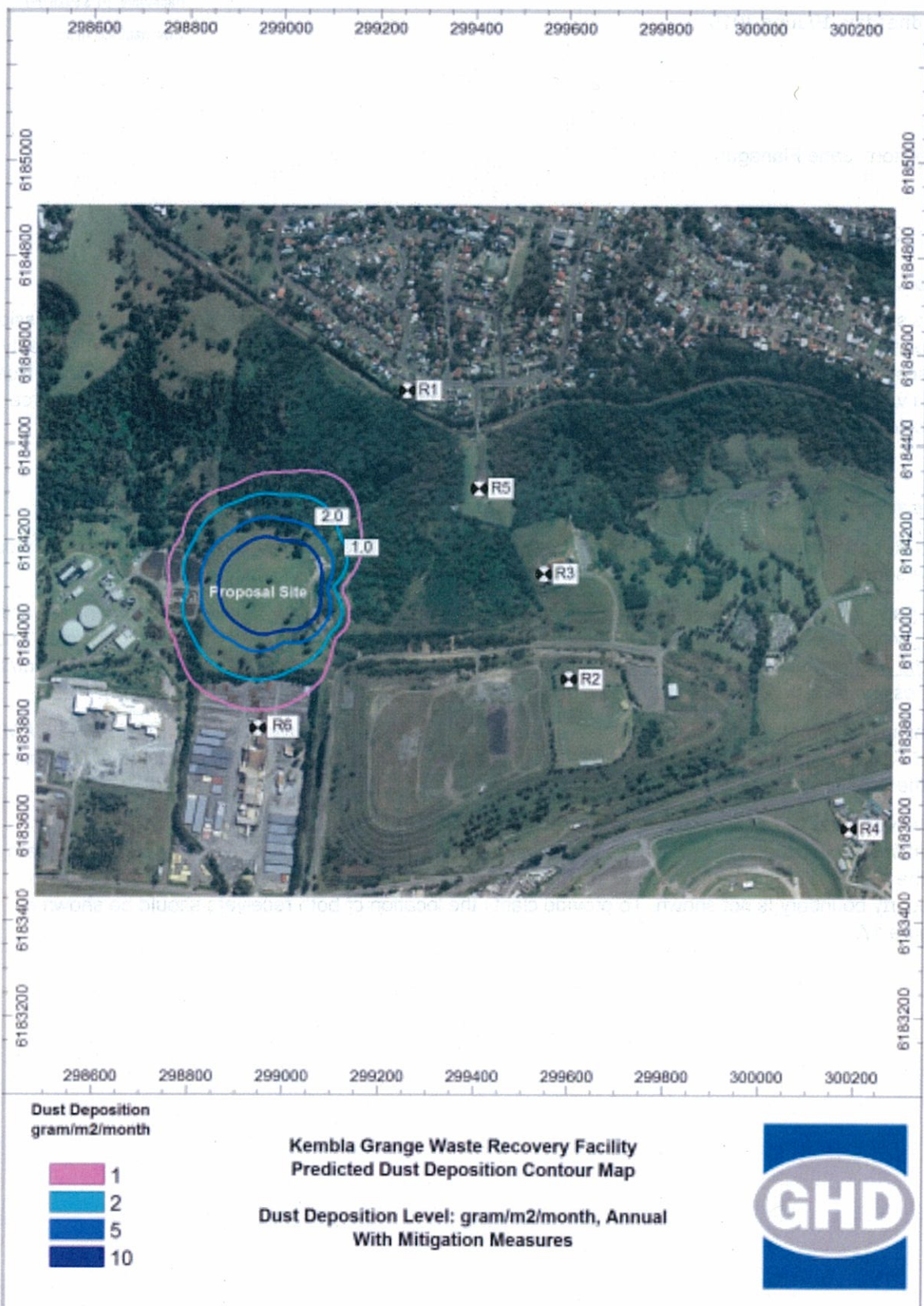


Figure 17 – Predicted –Annual dust deposition (with mitigation) g/m²/month

Location of Sensitive Receiver – PM10 Concentrations

As noted above, GHD have predicted the dust deposition rates based on a sensitive receiver at our property boundary whilst modelling the sensitive receivers for the other impacts based on a location at the northern edge of the site's building named "R6".

At this location the proposed development is forecast to create a cumulative PM10 impact of 49.3 µg/m³ against an impact criteria of 50 µg/m³. The forecast impact is within 1.4% of the criteria limit.

The borderline PM10 result is confirmed by Figure 15 of the GHD assessment "Predicted Cumulative PM10 24-hour Average Concentration (with mitigation) µg/m³" (included below). The location of the sensitive receiver "R6" appears to be located on the PM10 cumulative impact contour level 50 µg/m³. This contour level defines the area of impact within which the PM10 impact criteria would be exceeded. Had the sensitive receiver R6 been located 10 metres further west or north, Figure 15 shows it is highly likely the criteria would be exceeded. GHD modelled a location on our northern boundary when predicting dust deposition impacts. Had GHD used the same "conservative" assumption for predicting PM10 impacts, it would have exceeded the criteria. We do not have confidence that the Air Quality Assessment's results are valid when the conclusions of the assessment appear to be highly sensitive to variations in the location of the sensitive receiver.

We note that the Glossary within *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* defines Sensitive Receptors as "A location where people are likely to work or reside; this may include a dwelling, school, hospital, office or public recreational area. An air quality impact assessment should also consider the location of known or likely future sensitive receptors. For hydrogen fluoride, a sensitive receptor includes land-use areas with vegetation sensitive to hydrogen fluoride such as grapevines and stone fruit." (emphasis added).

Our workers are not confined to buildings on the site, with staff maintaining and handling vehicles which are parked on the hard stand surfaces across the site. Furthermore, vehicles for future sale are stored across the site in the open air. As per the hydrogen fluoride example above the stored vehicles would be classed as sensitive receivers along with staff, as dust and particularly dust from concrete crushing has the potential for vehicles to require full paint resprays, or an acid wash, incurring both time and financial costs.

The location of R6 was chosen to reflect the nearest building as stated on page 40 of GHD's assessment "**Note for Patrick Autocare PM10, PM2.5 and TSP have been predicted at the nearest building.**". That building is a relic of previous uses of the site and is not significant to site operations. We consider that the R6 location does not adequately address the worst case impacts on staff and vehicles, with vehicles stored within 30m of the northern site boundary. According to Figure 15 of the GHD assessment, the cumulative PM10 concentrations will exceed the 50 µg/m³ limit across the northern end of the site and will exceed 80 µg/m³ along parts of the northern site boundary. Consequently it would be more appropriate for sensitive receiver R6 to be placed on the northern boundary. This would be consistent with the location used for dust impacts and would require the applicant to demonstrate that all the areas of the site where our staff work and vehicles are stored will not be impacted beyond the criteria limit.

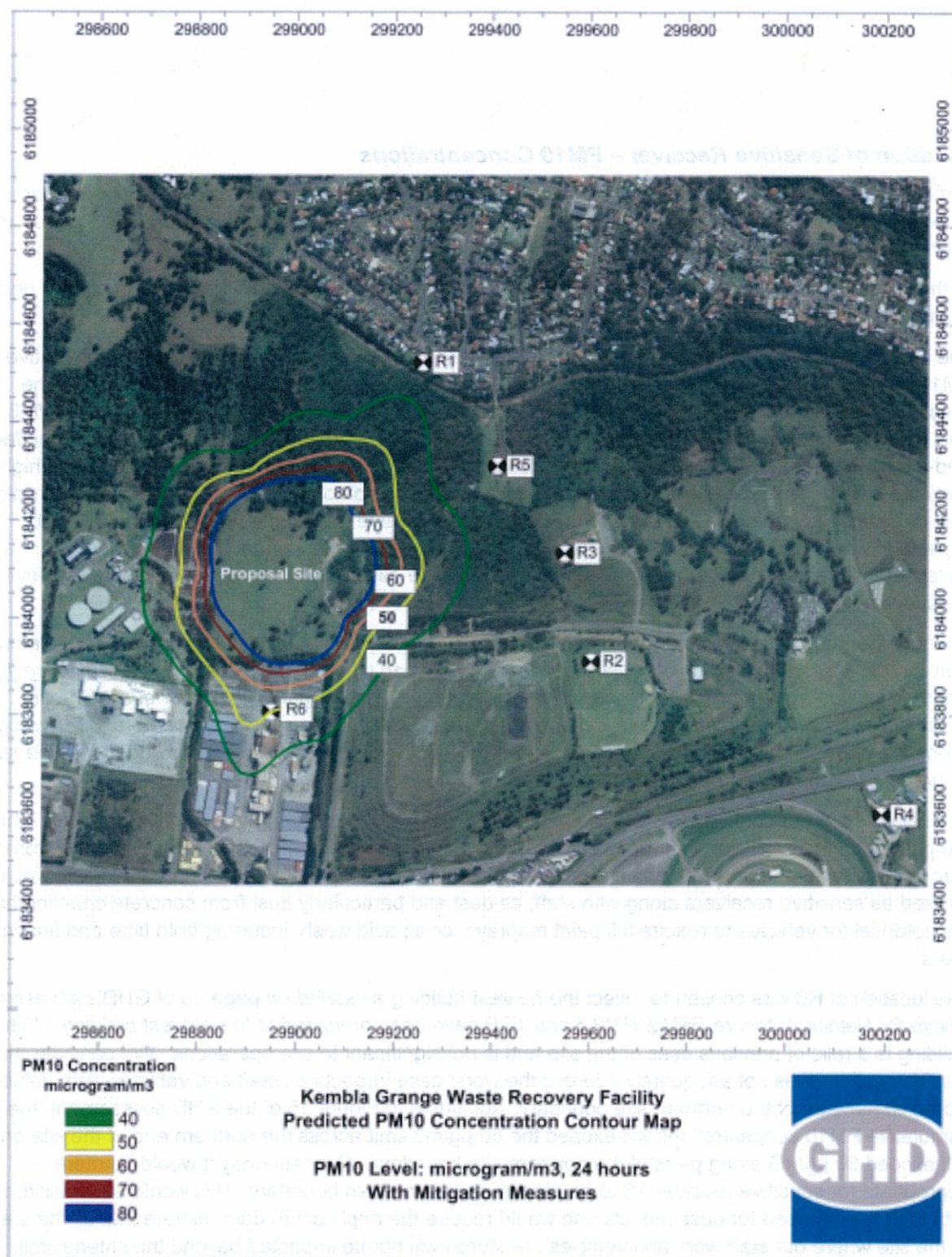


Figure 15 – Predicted – Cumulative PM₁₀ 24-hour Average Concentration (with mitigation) $\mu\text{g}/\text{m}^3$

Location of Sensitive Receiver – Odour

As noted in our previous submission, we are concerned that Odour impacts could damage vehicles stored at the northern area of the site, near the boundary. This would diminish their value to buyers and potentially harm operations at the site.

The GHD air quality assessment does model our site via sensitive receiver R6 located north of the buildings on site. However, as noted above this location does not reflect the greatest potential impact likely to be experienced by the work force and vehicle stock on the site. Figure 19 of the GHD assessment "Predicted Peak odour Contour Map, OU with building ventilation" (included below) indicates that the 2 OU criteria limit will be exceeded on our site within approximately 100 metres of the northern site boundary.

Consequently, a sensitive receiver location at the northern boundary would be more appropriate and provide a more conservative assessment requiring the proponent to modify their proposal so that the entirety of our site will not suffer odour impacts beyond the limits specified in the air quality criteria.



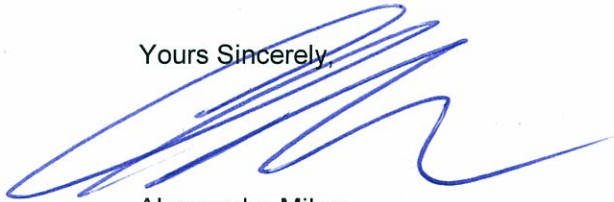
Figure 19 – Predicted Peak Odour Contour Map, OU with building ventilation

Conclusion

The updated Air Quality Assessment by GHD does not resolve all of our concerns regarding the impact of the proposal on staff and operations. We request that the Air Quality Assessment be conducted with a sensitive receiver located on the boundary between our site and the proposal for PM10 and Odour impacts. The proponent has already completed this analysis for dust deposition impacts to provide a more conservative analysis and demonstrate that the entirety of our site will be not adversely affected.

Please feel free to contact me to discuss the content of this submission.

Yours Sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke at the end.

Alessandro Milan
Divisional General Manager

For and on behalf of Patrick Autocare

