

STATEMENT OF ENVIRONMENTAL EFFECTS

PROPERTY DETAILS

Angel Partners Pty Ltd
Part Portion 111, Parish of Tataila
78 Hillside Road, Moama, NSW 2731

DESCRIPTION OF THE PROPOSED DEVELOPMENT AT PART PORTION 111, PARISH OF TATAILA, 78 HILLSIDE ROAD, MOAMA, NSW 2731

The facility situated at Part Portion 111, Parish Of Tataila, 78 Hillside Road, Moama, NSW 2731 (the site) was designed to operate as a small hydrocarbon storage and processing plant. The site has been repurposed to operate a distillation process for ethanol originating from Hand Sanitiser waste. The hand sanitiser is unpacked and distilled to recover the ethanol for reuse.

The proponents have prepared this Statement of Environmental Effects to enable it to increase the scope of the facility and what it can offer within the existing operational capability of the plant. This will not involve any increase in the limits that have been imposed on the site for receiving material.

At present the site is only able to receive and process G110 Organic Solvents excluding halogenated Solvents (Hand Sanitiser) which is set at 500 Pallets or 250,000 Litres. The owners seek to alter the above description removing hand sanitiser as the restriction to enable ethanol originating from pharmaceutical manufacture to be received and processed through the same distillation column. The ethanol is then supplied as a raw material for the manufacture of new products.

The proponents also seek to utilise the existing tanks available at the facility for the storage and consolidation of hydrocarbon waste (J120 Waste Oil/Water, hydrocarbons/ Water mixtures or emulsions, and J100 Waste mineral oils unfit for their original intended use). This material will be bought from areas around the region, bulked up at the facility prior to this material being then sent by B-Double for rerefining at another facility to produce base oil.

All these activities are within the scope of the existing plant and would not require any changes to the existing operations or equipment. A layout of the key areas of the plant are shown in Figure 1 below.



Figure 1 – Site Plan with Area Designation

Area	Description
A	Storage area for packaged Hand Sanitiser
B	Receival and Dispatch area and Hand sanitiser unpacking
C	Bulk Ethanol and Hydrocarbon Storage Area
D	Ethanol Distillation Processing area

78 Hillside Road, Moama is situated within the Murray River Council jurisdiction. The property encompasses approximately 8.28 Hectares and is designated for general industrial use.

The surrounding area is characterised by a mix of industrial and rural landscapes, with neighbouring properties along Hillside Road sharing similar zoning and land sizes. To the north of the site sits the local sewerage authority treatment facility, to the west is a metal recycling facility, to the east is the Moama waste management facility and to the south agricultural land.

The region is relatively flat, with a ground elevation of about 98 meters, and lacks significant bushfire, flood or heritage overlays, indicating minimal environmental constraints.

The area is accessible via local road networks, with Hillside Road connecting to major routes facilitating transportation and logistics for industrial operations. Figure 2 below shows the site in relation to the surrounding topography.



Figure 2 – Moama Facility Locality Map

OPERATIONAL AND MANAGEMENT DETAILS

The facility will operate 24 hours per day 7 days per week to optimise the efficiency of running the distillation column. The site will employ at least 10 personnel to operate the facility over 2-3 shifts. This will include a site operations supervisor. The site has allocation of 15 designated car parking spaces for its staff, allowing for the occasional trades that may be required on site. There are 4 visitor car parks and one car park that will be allocated for disabled and sign posted appropriately.

It is proposed waste will either arrive as packaged material as will be the case for Hand Sanitiser or bulk tankers as would be the case for Ethanol G110, Oily Water J120, and Mineral Oil J100. A flow chart of the Oil bulking process is depicted in Figure 3 below. This

process will operate in area C. Hand sanitiser packages are stored in area A until they are processed. Only Hand sanitiser packages will be stored in this area.

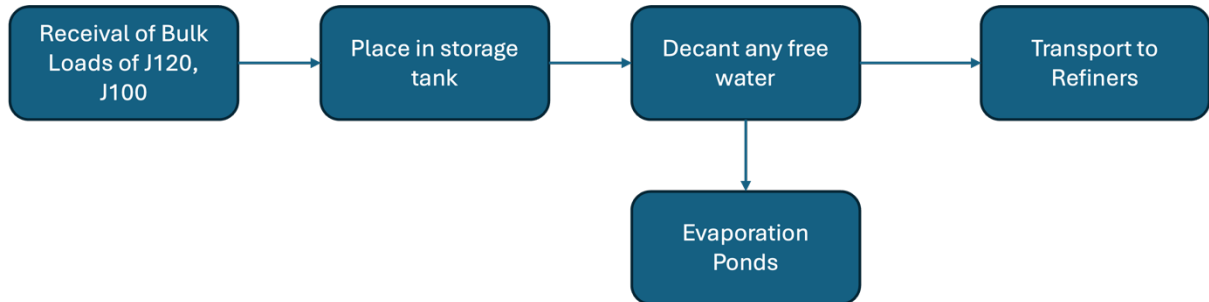


Figure 3 – Flowchart of Oil Consolidation and Storage

The packaged material will go into area B where the material is manually bulked up and cardboard and plastic separated for recycling. The bulked hand sanitiser is then placed in the storage tanks for processing through the distillation column in area D. A flow chart of the Hand Sanitiser distillation process is shown below in Figure 4.

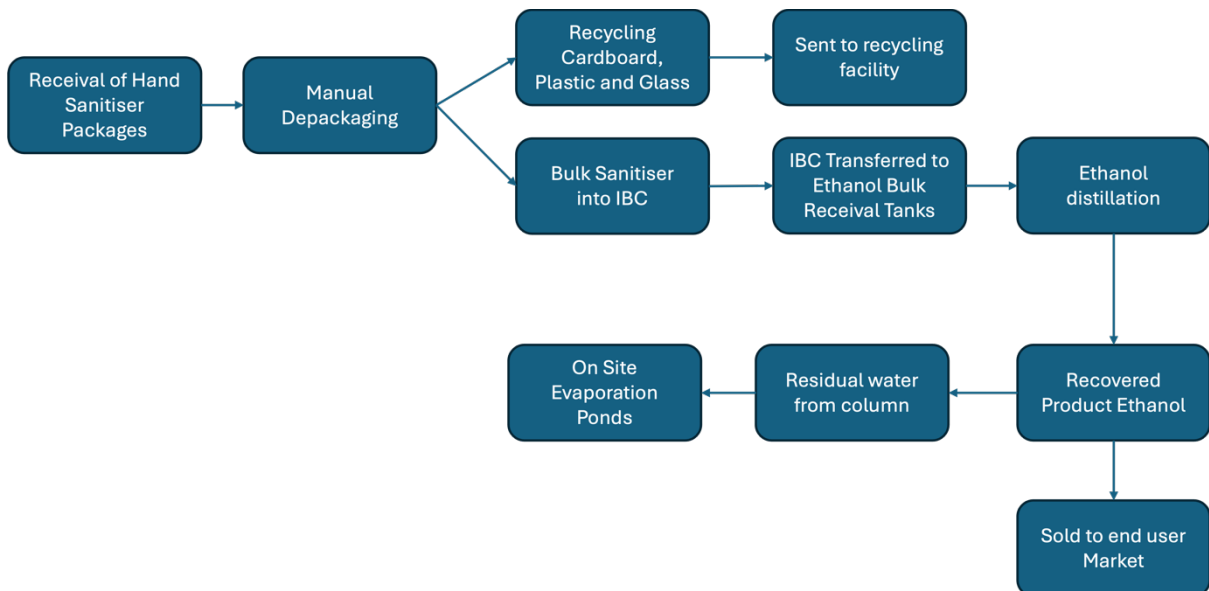


Figure 4 – Flowchart of Sanitiser and distillation process

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The region is relatively flat, with a ground elevation of about 98 meters, and lacks significant bushfire, flood or heritage overlays, indicating minimal environmental constraints.

The area is accessible via local road networks, with Hillside Road connecting to major routes facilitating transportation and logistics for industrial operations.

The facility itself contains office buildings, a tank farm and ethanol distillation facility, loading and unloading truck bay. All these facilities will be retained, and no new facilities will be constructed.

The site services on the site are imperative to the site's operation. Potable water use fit for human consumption will be piped in or stored on site. Most of the process water will utilise recycled water wherever feasible including utilisation of recycled water from the adjacent sewerage authority.

Cooling water will be generated using cooling towers and evaporative cooling. The cooling Tower will regulate the temperature of the water through the evaporative cooling process. The make-up water to replace any water evaporated will come from recycled sources (such as water authority recycled water as well as internal water recycling sources).

A flush cycle will be implemented to reduce the risk of high TDS (salt levels) build up in the cooling tower. The calculated water requirement for the cooling tower based on water make up requirements will be in the order of 14,400 kg/day evaporated to the environment.

Steam is generated through boiler systems to provide the heat source to operate the ethanol distillation column. The boilers are fuelled using purchased fuel oil with a low sulphur content that is less than the Australian Standard for Diesel.

Any wastewater generated from the distillation column and dewatering of the J120/J100 storage tanks will go into the newly lined evaporation ponds to be evaporated. The ponds are designed and signed to provide a water balance for the 40KL of process water that will

discharge to these ponds daily. The three ponds combined have a water holding capacity of 3.6 ML. Considering that the pond water will also be used as recycling water through the plant it is envisaged that at least one pond will be emptied every 6 months for off-site disposal to an EPA licensed waste treatment facility to ensure a net water balance for the site.

Based on available property data this site does not have any bushfire, flood or heritage overlays.

The proposed increase of five additional trucks per day to the Moama site represents a minor and insignificant change in overall traffic volume. Given the existing road infrastructure and current traffic levels in the area, this increase equates to a marginal impact on road capacity, vehicle flow and overall congestion. The additional truck movements are well within the operational capacity of the surrounding road network and are unlikely to cause noticeable disruptions to local traffic patterns or road safety. Furthermore, the proposed increase aligns with typical industrial and commercial activities in the area, ensuring minimal impact on residents and other road users.

PLANNING CONSIDERATIONS

State Environmental Planning Considerations

Evaluation of the development in relation to applicable State Environmental Planning Considerations have identified that State Environmental Planning Policy No.33 (SEPP33) which addresses developments that may be classified as potentially hazardous or potentially offensive will apply.

The main components applicable to this development are in relation to Potentially Hazardous Industry, which is defined as an industry that, without specific safeguards, could pose a significant risk to people, property or the environment. The main trigger whereby SEPP 33 needs to be considered is in relation to the Dangerous Goods threshold quantities for flammables (Class 3) Packaging Group II being 50 tonnes. The development is licenced to accept 250 tonnes and therefore SEPP 33 needs to be considered in the application.

As this application does not result in alteration of the previous limits and any alterations to equipment and process the previous hazard assessments still apply. The development was issued approval and has been operating for a significant period and therefore all control measures required to mitigate the risks of SEPP 33 are already in place and operational.

The measures already established at the facility include:

- Emergency and Spill Response Plan
- Segregation And Bunding Of All Dangerous Goods In Accordance The Dangerous Goods Classes
- Existing Environmental Protection License Is In Place
- Fire Management Plan Is Established And In Place
- Hazard Analysis On Distillation Previously Undertaken Still Current
- Safety Systems In Place For Worker Safety
- Waste Management Plan In Place For Recycling Of Material And Disposal Of Residual Waste

Based on the above management systems and controls the development complies with the requirements of SEPP 33.

Local Environmental Plan

In accordance with the Murray Local Environmental Plan (LEP) 2011, land in the development is predominantly zoned as RU1 Primary Production. However, the Murray Development Control Plan (DCP) 2012 identifies a significant industrial area along Hillside Road, north of Moama which is zoned as IN1 General Industrial. This zoning IN1 General Industrial applies to the development for 78 Hillside Road Moama.

The land use of the site is currently defined as General Industry which is defined in the Murray Local Environmental Plan as meaning a building or place (other than a heavy industry or light industry) that is used to carry out an industrial activity.

The use is permissible within the zone.

The objectives of the permissible use and how the development complies with these objectives is provided below:

The Moama facility ensures the efficient and viable use of industrial land by incorporating sustainable land use practices, optimising industrial operations and aligning with local planning regulations. This can be demonstrated as follows:

- The facility is strategically located within an industrial-zoned area (IN1 General Industrial), ensuring compatibility with surrounding land uses.
- It aligns with the Murray River Council's industrial development strategies, supporting employment growth and economic activity.

- By consolidating ethanol recycling and waste oil consolidation within a single facility, the site maximises its industrial footprint. This reduces the need for multiple smaller waste processing sites, thereby enhancing land efficiency.
- Ethanol recovery from hand sanitiser and industrial sources reduces reliance on virgin ethanol production, supporting a circular economy model.
- The facility reduces the volume of waste sent for disposal by recovering reusable materials

Planning Considerations – Murray Local Environmental Plan 2011

The relevant sections of the Murray Local Environmental Plan (LEP) 2011 that are applicable to the proposed development are detailed below.

Land Use Zones

The Murray Local Environment Plan (LEP) 2011 outlines land use zones (RU1 Primary production, E4 General Industrial) and specifies permissible and prohibited uses within each zone.

The development aligns with the permissible uses within the designated land use zone. The development is permitted with consent. The proposal does not involve residential or sensitive uses that would conflict with industrial or agricultural objectives. Since the requested changes are within the scope of the existing infrastructure and not an introduction of any new industrial process. No significant changes to land use or additional structures are proposed.

Clause 2.3 Zone Objectives and Land Use Table

This clause details the objectives of each zone and the types of development permitted with or without consent.

The proposed development complies with the objectives of this clause as it is continuing an existing lawful land use without altering site operations. The development further supports efficient resource management through expansion of its ethanol recycling feedstock to include ethanol from pharmaceutical processing and efficient oil management through consolidated storage reducing vehicle traffic on highways.

The development will continue to ensure compliance with environmental and safety regulations for storage and distillation of ethanol.

Clause 5.10 – Heritage Conservation

If the property is listed as a heritage item or located within a heritage conservation area, this clause outlines requirements to conserve the environmental heritage of the area.

Based on the available information from the Murray River Council's heritage register and the New South Wales State Heritage Register The development on 78 Hillside Road Moama is not listed as a heritage site.

Clause 5.21 – Flood Planning

This clause applies to land identified as flood-prone and outlines controls to minimise risk to life and property from flooding.

A review of the Echuca – Moama – Torrumbarry Flood Study shows that the proposed development is not directly impacted by any flooding in the area even when modelled at 20% AEP Flood depth. See Figure 5 below.

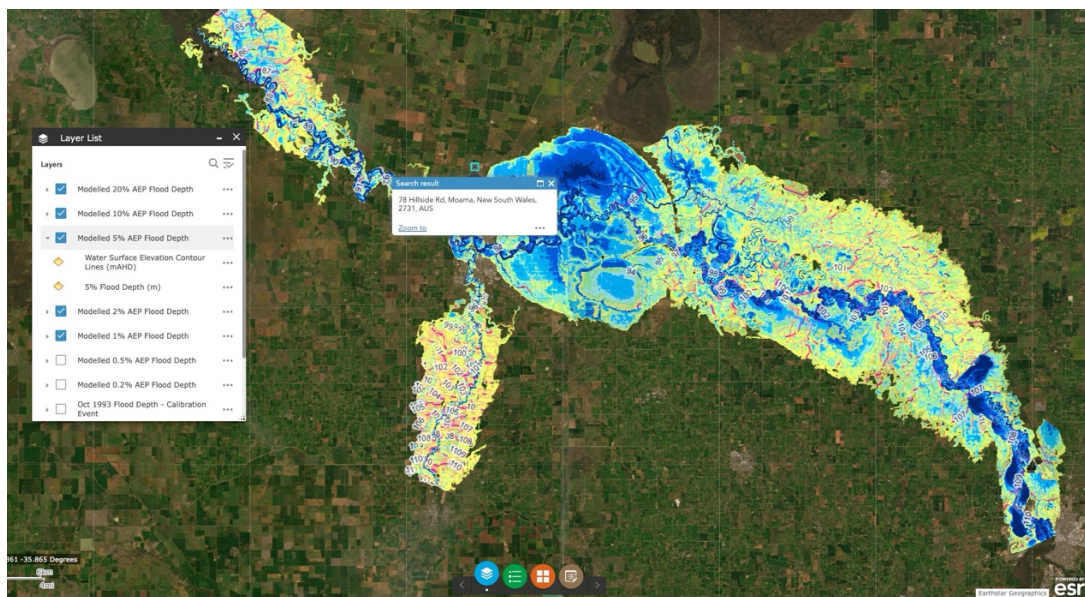


Figure 5 – Flood Study impact to 78 Hillside Road

Clause 7.5 Riparian Land and Watercourses

If the property is adjacent to a watercourse, this clause provides controls to protect and maintain the ecological functions of riparian land.

Review of the Watercourse Maps forming part of the Murry Local Environmental Plan 2011, there is no Riparian Lan and Waterways near the development.

Irrespective the development will ensure no additional discharge or environmental impacts are introduced. Existing stormwater and spill containment measures have been established to ensure no off-site impacts to the environment.

Planning Considerations – Murray Development Control Plan 2012

The relevant sections of the Murray Development Control Plan 2012 that are applicable to the proposed development are detailed below.

Chapter 3 Industrial Development

This section offers guidelines on site planning, building design, landscaping, parking and access for industrial developments, which can be applicable to the development at 78 Hillside Road, Moama.

The proposed changes in the type of material to be accepted at the facility does not affect building design, parking or access. The existing site layout remains unchanged.

Chapter 7 – Subdivision

This section provides controls on lot design, infrastructure and services which may be relevant if the development involves lad sub division.

No Subdivision or boundary modifications are involved. All existing infrastructure and services (power, water, drainage , roads) is in place and remains unchanged.

Chapter 11-Flood Prone Land

This section outlines the requirements for developments on flood-prone land, including design considerations and risk mitigation measures.

The site is not prone to any flooding as has been addressed earlier in this submission.