



**Environment,
Climate Change
& Water**

Your reference:

WWLEP2010-Cartwrights Hill
"Deferred Area"

Our reference:

FIL08/4013-02;DOC10/58214

The General Manager
Wagga Wagga City Council
PO Box 20
WAGGA WAGGA NSW 2650

Attention: Ian Grant

Dear Mr Pinyon

Re Wagga Wagga LEP 2010 – Cartwrights Hill "Deferred Area"

I refer to your letter dated 10 December 2010 to the Department of Environment, Climate Change and Water (DECCW) seeking advice on the management of odours from Bomen heavy industries.

DECCW strongly supports the concept of what is now known as the Bomen Industrial Park. It consolidates industrial activities, reducing the interface with potentially sensitive land uses. We encourage a strategic approach to the development of sound land use planning provisions forming the basis of the Local Environment Plan (the Plan).

DECCW, as the regulator of several premises in the Bomen Industrial Park, has encouraged Council to maintain suitable separation distances between the Bomen Industrial Park and potentially sensitive land uses such as residential. We have previously provided Council with specific advice on the areas of concern to DECCW (please refer to our letter dated 1 October 2010). We are also aware that other stakeholders will have also provided advice to Council as part of this process, and that in finalising the Plan Council has a significant challenge in delivering balanced social, economic and environmental outcomes from this process.

We acknowledge Council's position in this regard, however it is our role in this process to ensure that Council is aware that the strategic planning objectives for environmental amenity should minimise the impacts of noise, odour and dust on sensitive land uses by ensuring adequate separation between incompatible land uses.

We will continue to regulate licensed premises located within the Bomen Industrial Park to achieve contemporary environmental management standards. These standards have been designed to limit emissions from industrial premises. However, Council should note that these standards do not require industries to completely eliminate emissions beyond the boundary. This is particularly the case for noise and odour.

There are several examples of companies in the Bomen Industrial Park that have worked cooperatively with DECCW and the community over recent years to improve their environmental performance. Companies such as Cargill Australia Limited, HJ Heinz Company Australia Limited and Southern Oil Refining Pty Ltd have all entered into Pollution Reduction Programs (PRPs) with DECCW to address improve their performance. In some instances, such as HJ Heinz Pty Ltd the works are complete, in others they are on going.

As requested by you please find at Attachment 'A' copies of recent PRPs negotiated by DECCW with these licensees. These PRPs are aimed at controlling emissions to air and reducing offensive odour impacts to achieve contemporary environmental management standards.

If you have any further enquiries about this matter please contact me by telephoning 02 6969 0700.

Yours sincerely

 21.2.2011

CRAIG BRETHERTON
Manager South West
Environment Protection and Regulation

cc Mr Graham Judge
Department of Planning
Level 1
11 Farrer Place
QUEANBEYAN NSW 2620

ATTACHMENT 'A'

Premises

Cargill Australia Limited
Dampier Street
Wagga Wagga

Environment Protection Licence No 2262

Render Plant Pollution Reduction Program

1.1.1 The licensee must undertake the works outlined in the correspondence titled Render Plant Action Register revised 24march09.xls provided by the licensee by email on 27 March 2009 and contained on file LIC07/518-02.

1.1.2 By 30 December 2011, the licensee must undertake and submit an Odour Impact Assessment and Control Report to the Department of Environment, Climate Change and Water (DECCW) Unit Head Albury PO Box 544 Albury NSW. The report must:

- a) Identify all significant emission sources of odour and their air emission concentrations/rates from the rendering plant following completion of the proposed works.
- b) Benchmark each process and activity potentially emitting odour against comparable international technology and good management practices for rendering plants.
- c) Determine compliance of odour emissions with the relevant impact assessment criteria specified in section 7 of the *approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*.

Note: The odour assessment should be undertaken in accordance with:

- a) NSW DEC, 2006, Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW, November 2006.
NSW DEC, 2006, Technical Notes, Assessment and Management of Odour from Stationary Sources in NSW, November 2006.

Premises

HJ Heinz Company Australia Limited
Bomen Road
Wagga Wagga

Environment Protection Licence 1361

Pollution Reduction Program

1.1 By 30 September 2009 install and maintain works at the premises designed to control the emission of offensive odours from the cooking processes.

1.2.1 By 28 February 2010 install and maintain works at the premises designed to control the emission of offensive odours from the wastewater treatment system.

1.2.2 From 20 April 2009 the licensee is required to monitor the condition and odour generation potential of the waste generated by the wastewater treatment system (other than those liquid wastes discharged to sewer) and arrange for timely disposal prior to the water generating offensive odours.

Premises

Southern Oil Refining Pty Ltd
42 Lewington Street
Bomen

Environment Protection Licence 11408

Pollution Reduction Program

1. The Licensee must assess the performance of air pollution control equipment in regard to the control of Particulates (PM₁₀) and submit a report to DECCW's Manager, South West Region by 1 May 2011. the report must address the following:
 - a. The concentration/rates of all significant point source emissions of Particulates (PM₁₀) from the premises must be determined strictly in accordance with the methods detailed in *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW*, NSW DEC August 2005; and
 - b. All air pollution control equipment must be identified and the operational performance assessed based on the equipment manufacturer's design specification, manufacturer's performance guarantees and actual performance as determine in 1a.
2. The licensee must review all practical options for mitigating or controlling any (PM₁₀) emissions which exceed the *Protection of the Environment Operations (Clean Air) Regulation, (2002)* Group 6 Limits. The potential reduction in the emission concentration and rate and air quality impacts associated with each mitigation option must be quantitatively evaluated;
3. By 30 June 2012 the licensee must use the results of 1a, 1b and 2 to identify emission controls and management practices to achieve the most cost effective air quality impact mitigation option to ensure that the criteria detailed in 2 can be met. The licensee must set out a timeframe to implement all necessary actions to achieve the *Protection of the Environment Operations (Clean Air) Regulation, (2002)* Group 6 Limits; and,
4. All necessary actions to achieve the *Protection of the Environment Operations (Clean Air) Regulation, (2002)* Group 6 Limits must be implemented and fully operations by 1 September 2012.